



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: June 30, 2011

RE: Firestone Building Products Company / 097 - 30565 - 00140

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FN-REGIS.dot 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

**Firestone Building Products Company
3525 South Arlington Avenue
Indianapolis, Indiana 46203**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 097-30565-00140	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 30, 2011

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary manufacturing facility for asphalt roofing materials.

Source Address:	3525 South Arlington Avenue, Indianapolis, Indiana 46203
General Source Phone Number:	317-781-4182
SIC Code:	2952 (Asphalt Felts and Coatings)
County Location:	Marion County
Source Location Status:	Nonattainment for PM 2.5 Attainment for all other criteria pollutants
Source Status:	Registration Not 1 of 28 Listed Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) modified bitumen asphalt roofing line (Line 1), identified as EU-01, constructed in 1990, with a maximum capacity of 22,603 pounds of asphalt compound per hour, and 13,461 pounds of limestone filler per hour. Mineral products are applied to the surface of the roll roofing (Asphalt-saturated fiberglass substrate). The system consists of three (3) 12-ton capacity mix tanks, one (1) 10-ton capacity mix tank, one (1) 15-ton use tank, and one (1) two section impregnation vat. All of the components of this system use a Monsanto Mist Eliminator (MME) identified as CE-01 for control, and exhausts to a 59-foot stack, identified as Stack 1.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

Under 40 CFR 63, Subpart AAAAAAA (7A), this is considered an affected facility.

- (b) One (1) 100-ton storage silo for calcium carbonate filler material, identified as EU-02, constructed in 1990. Control equipment consists of one (1) Whirl Airflow dust collector identified as CE-04 for control, and exhausts to Stack 2.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (c) One (1) 50-ton capacity sand storage silo, identified as EU-07, handling 10,205 tons of sand per year, constructed in 1994. The silo is equipped with an Ultra Industries baghouse identified as CE-07 for control, and exhausts to Stack 7.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (d) One (1) water based roofing granule treatment system to be applied on the Modified Bitumen to continuously-fed fiber glass roofing material to improve the performance and characteristics of roofing granules, approved for construction in 2010, with a maximum capacity of 2 tons/ hour of mineral products, exhausting indoors. All of the components of this system use a cartridge filter system, CE-06, to control particulate emissions and exhaust through stack 6.

The process consists of following equipment:

- (1) one (1) bulk bag to bucket elevator
- (2) one (1) bucket elevator to elevator storage
- (3) one (1) elevated storage to blender
- (4) one (1) mixer to elevated storage
- (5) one (1) elevated storage to bucket elevator
- (6) one (1) drying process
- (7) tote filling operation
- (8) one (1) HEPA cartridge air handling system

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (e) Three (3) 3,470 cubic foot (98.25 cubic meters) asphalt storage tanks, with two (2) installed in 1990, and one (1) installed in 1998, and relocated in 2011, with all three tanks using a Monsanto Mist Eliminator (MME), identified as CE-01 for control, and exhausting to a 59-foot stack, identified as Stack 1.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (f) One (1) 3,370 cubic foot (95.41 cubic meters) liquid polypropylene storage tank, installed in 1990, using no controls.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (g) One (1) natural gas fired Heatec Thermal Fluid Heater, identified as EU-03, installed in 1989, with a capacity of 6 million Btu per hour, using no controls, and venting to Stack 3.
- (h) One (1) natural gas fired Inferno Therm Polyolefin (APP) Heater, identified as EU-08, installed in 1989, with a capacity of 0.8 million Btu per hour, using no controls, and venting to Stack 8.
- (i) Fourteen (14) seasonally used natural gas space heaters, with a combined maximum capacity of 15.2 MMBtu/hour.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 097-30565-00140 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, IN 46204-2251

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

Testing Requirements [326 IAC 2-5.1-3(e)(2)]

C.3 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

- (b) The Registrant shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Registrant submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)]

C.4 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Registrant may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Registrant can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.5 Response to Excursions or Exceedances [326 IAC 2-5.1-3(e)(2)]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Registrant shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Registrant has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Registrant shall record the reasonable response steps taken.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]

C.6 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) modified bitumen asphalt roofing line (Line 1), identified as EU-01, constructed in 1990, with a maximum capacity of 22,603 pounds of asphalt compound per hour, and 13,461 pounds of limestone filler per hour. Mineral products are applied to the surface of the roll roofing (asphalt-saturated fiberglass substrate). The system consists of three (3) 12-ton capacity mix tanks, one (1) 10-ton capacity mix tank, one (1) 15-ton use tank, and one (1) two section impregnation vat. All of the components of this system use a Monsanto Mist Eliminator (MME) identified as CE-01 for control, and exhausts to a 59-foot stack, identified as Stack 1.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emissions Limitations Except Lake County [326 IAC 6.5-1-2][326 IAC 6.5-6]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the asphalt roofing line, EU-01, shall not exceed 0.03 grain per dry standard cubic foot (dscf).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for Line 1 operations (EU-01) and control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this Condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Compliance Determination

In order to comply with Condition D.1.1, the Mist Collector MME, identified as CE-01, shall operate at all times that the asphalt roofing line EU-01 is operating.

Compliance Monitoring Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the CE-01 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedences contains the Permittee's obligation with regard to the excursions and exceedences required by this condition. Failure to take

reasonable response steps shall be considered a deviation from this permit.

D.1.5 Monsanto Mist Eliminator Parameter Monitoring

- (a) The Permittee shall record the pressure drop across the Monsanto Mist Eliminator (CE-01) used in conjunction with Line 1 at least once per day when the roofing line is in operation. When for any one reading, the pressure drop across the Monsanto Mist Eliminator is outside the normal range of three (3) and twelve (12) inches of water, or a range established during the most recent stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances.- contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months. Section C - Instrument Specifications contains the Registrant's obligation with regard to the instrument specifications required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a record of the daily visible emission notations of the CE-01 stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of the pressure drop across the Monsanto Mist Eliminator (CE-01). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) One (1) 100-ton storage silo for calcium carbonate filler material, identified as EU-02, constructed in 1990. Control equipment consists of one (1) Whirl Airflow dust collector identified as CE-04 for control, and exhausts to Stack 2.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (c) One (1) 50-ton capacity sand storage silo, identified as EU-07, handling 10,205 tons of sand per year, constructed in 1994. The silo is equipped with an Ultra Industries baghouse identified as CE-07 for control, and exhausts to Stack 7.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (d) One (1) water based roofing granule treatment system to be applied on the Modified Bituman to continuously-fed fiber glass roofing material to improve the performance and characteristics of roofing granules, approved for construction in 2010, with a maximum capacity of 2 tons/ hour of mineral products, exhausting indoors. All of the components of this system use a cartridge filter system, CE-06, to control particulate emissions and exhaust through stack 6.

The process consists of following equipment:

- (1) one (1) bulk bag to bucket elevator
- (2) one (1) bucket elevator to elevator storage
- (3) one (1) elevated storage to blender
- (4) one (1) mixer to elevated storage
- (5) one (1) elevated storage to bucket elevator
- (6) one (1) drying process
- (7) tote filling operation
- (8) one (1) HEPA cartridge air handling system

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.2.1 Particulate Emissions Limitations Except Lake County [326 IAC 6.5-1-2][326 IAC 6.5-6]

- (a) Pursuant to 326 IAC 6.5-1-2, particulate emissions from the storage silo, EU-02, shall not exceed 0.03 grain per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.5-1-2, particulate emissions from the sand storage silo, EU-07, shall not exceed 0.03 grain per dry standard cubic foot (dscf)

- (c) Pursuant to 326 IAC 6.5-1-2, particulate emissions from the granule treatment process shall not exceed 0.03 grain per dry standard cubic foot (dscf).
-

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for EU-02, EU-07, and the granule treatment process, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.2.3 Compliance Determination

- (a) In order to comply with Condition D.2.1, the dust collector, identified as CE-04, shall operate at all times that the storage silo EU-02 is operating.
- (b) In order to comply with Condition D.2.1, the dust collector, identified as CE-07, shall operate at all times that the sand storage silo EU-07 is operating.
- (c) In order to comply with Condition D.2.1, the cartridge filter system, identified as CE-06, shall operate at all times that the granule treatment process is operating.

SECTION D.3

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (g) One (1) natural gas fired Heatec Thermal Fluid Heater, identified as EU-03, installed in 1989, with a capacity of 6 million Btu per hour, using no controls, and venting to Stack 3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.3.1 Particulate Matter Emissions (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Indirect Heating), particulate emissions from the EU-03 heater shall be limited to 0.68 pounds per million British thermal units (lbs/MMBtu) based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. Q for EU-03 6.0 MMBtu/hr.

SECTION E.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) modified bitumen asphalt roofing line (Line 1), identified as EU-01, constructed in 1990, with a maximum capacity of 22,603 pounds of asphalt compound per hour, and 13,461 pounds of limestone filler per hour. Mineral products are applied to the surface of the roll roofing (Asphalt-saturated fiberglass substrate). The system consists of three (3) 12-ton capacity mix tanks, one (1) 10-ton capacity mix tank, one (1) 15-ton use tank, and one (1) two section impregnation vat. All of the components of this system use a Monsanto Mist Eliminator (MME) identified as CE-01 for control, and exhausts to a 59-foot stack, identified as Stack 1.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

Under 40 CFR 63, Subpart AAAAAAA (7A), this is considered an affected facility.

- (b) One (1) 100-ton storage silo for calcium carbonate filler material, identified as EU-02, constructed in 1990. Control equipment consists of one (1) Whirl Airflow dust collector identified as CE-04 for control, and exhausts to Stack 2.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (c) One (1) 50-ton capacity sand storage silo, identified as EU-07, handling 10,205 tons of sand per year, constructed in 1994. The silo is equipped with an Ultra Industries baghouse identified as CE-07 for control, and exhausts to Stack 7.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (d) One (1) water based roofing granule treatment system to be applied on the Modified Bituman to continuously-fed fiber glass roofing material to improve the performance and characteristics of roofing granules, approved for construction in 2010, with a maximum capacity of 2 tons/ hour of mineral products, exhausting indoors. All of the components of this system use a cartridge filter system, CE-06, to control particulate emissions and exhaust through stack 6.

The process consists of following equipment:

- (1) one (1) bulk bag to bucket elevator
- (2) one (1) bucket elevator to elevator storage
- (3) one (1) elevated storage to blender
- (4) one (1) mixer to elevated storage
- (5) one (1) elevated storage to bucket elevator
- (6) one (1) drying process
- (7) tote filling operation
- (8) one (1) HEPA cartridge air handling system

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the asphalt roofing materials manufacturing facility except as otherwise specified in 40 CFR Part 60, Subpart UU.

E.1.2 Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture [40 CFR 60 Subpart UU] [40 CFR 60.470]

The Permittee which engages in asphalt roofing manufacturing shall comply with the following provisions of 40 CFR 60, Subpart UU (included as Attachment A of this permit):

- (1) 40 CFR 60.472 (a)(1)(i)(ii)
- (2) 40 CFR 60.472 (a)(2)
- (3) 40 CFR 60.472 (a)(3)
- (4) 40 CFR 60.472 (b)(1)
- (5) 40 CFR 60.472 (b)(2)
- (6) 40 CFR 60.472 (b)(3)
- (7) 40 CFR 60.472 (b)(4)
- (8) 40 CFR 60.472 (b)(5)
- (9) 40 CFR 60.472 (c)
- (10) 40 CFR 60.472 (d)
- (11) 40 CFR 60.473 (a)
- (12) 40 CFR 60.473 (b)
- (13) 40 CFR 60.473 (c)
- (14) 40 CFR 60.473 (d)
- (15) 40 CFR 60.474 (a)(1)
- (16) 40 CFR 60.474 (a)(2)
- (17) 40 CFR 60.474 (a)(3)
- (18) 40 CFR 60.474 (b)
- (19) 40 CFR 60.474 (c)(1)
- (20) 40 CFR 60.474 (c)(2)
- (21) 40 CFR 60.474 (c)(3)
- (22) 40 CFR 60.474 (c)(4)(i)
- (23) 40 CFR 60.474 (c)(4)(ii)
- (24) 40 CFR 60.474 (c)(5)
- (25) 40 CFR 60.474 (d)
- (26) 40 CFR 60.474 (e)
- (27) 40 CFR 60.474 (f)(1)
- (28) 40 CFR 60.474 (f)(2)
- (29) 40 CFR 60.474 (g)

E.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee shall perform the stack testing as required under NSPS 40 CFR 60, Subpart UU, utilizing methods as approved by the Commissioner to document compliance with Condition E.1.2. These tests shall be repeated at least every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

SECTION E.2

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) modified bitumen asphalt roofing line (Line 1), identified as EU-01, constructed in 1990, with a maximum capacity of 22,603 pounds of asphalt compound per hour, and 13,461 pounds of limestone filler per hour. Mineral products are applied to the surface of the roll roofing (Asphalt-saturated fiberglass substrate). The system consists of three (3) 12-ton capacity mix tanks, one (1) 10-ton capacity mix tank, one (1) 15-ton use tank, and one (1) two section impregnation vat. All of the components of this system use a Monsanto Mist Eliminator (MME) identified as CE-01 for control, and exhausts to a 59-foot stack, identified as Stack 1.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

Under 40 CFR 63, Subpart AAAAAAA (7A), this is considered an affected facility.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

E.2.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants (NESHAP) [40 CFR Part 63, Subpart A] [326 IAC 20-1]

Pursuant to 40 CFR 63, Subpart AAAAAAA (7A), the Registrant shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the asphalt roofing line, EU-01, in accordance with schedule in 40 CFR 63 Subpart AAAAAAA.

E.2.2 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Area Sources of Asphalt Processing and Asphalt Roofing Manufacturing [40 CFR Part 63, Subpart AAAAAAA [326 IAC 20-1]

The Registrant, which engages in the manufacture of asphalt roofing materials, shall comply with the following provisions of 40 CFR Part 63, Subpart AAAAAAA (included as Attachment B of this permit), with a compliance date of December 2, 2009:

Applicable portions of the NESHAP are the following:

- (a) 40 CFR 63.11559
- (b) 40 CFR 63.11560(a)
- (1) 40 CFR 63.11561(b) and (c)
- (2) 40 CFR 63.11562
- (3) 40 CFR 63.11563
- (4) 40 CFR 63.11564
- (5) 40 CFR 63.11565
- (6) 40 CFR 63.11566
- (7) 40 CFR 63.11567
- (8) Tables 2, 3, 4, and 5

E.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee shall perform the stack testing as required under NESHAP 40 CFR 63, Subpart AAAAAAA, utilizing methods as approved by the Commissioner to document compliance with Condition E.2.2. These tests shall be repeated at least every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Firestone Building Products Company
Address:	3525 South Arlington Avenue
City:	Indianapolis, Indiana 46203
Phone Number:	317-784-1161
Registration No.:	097-30565-00140

I hereby certify that Firestone Building Products Company is :

still in operation.

I hereby certify that Firestone Building Products Company is :

no longer in operation.

in compliance with the requirements of Registration No. 097-30565-00140.

not in compliance with the requirements of Registration No. 097-30565-00140.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart UU—Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Source: 47 FR 34143, Aug. 6, 1982, unless otherwise noted.

§ 60.470 Applicability and designation of affected facilities.

(a) The affected facilities to which this subpart applies are each saturator and each mineral handling and storage facility at asphalt roofing plants; and each asphalt storage tank and each blowing still at asphalt processing plants, petroleum refineries, and asphalt roofing plants.

(b) Any saturator or mineral handling and storage facility under paragraph (a) of this section that commences construction or modification after November 18, 1980, is subject to the requirements of this subpart. Any asphalt storage tank or blowing still that processes and/or stores asphalt used for roofing only or for roofing and other purposes, and that commences construction or modification after November 18, 1980, is subject to the requirements of this subpart.

Any asphalt storage tank or blowing still that processes and/or stores only nonroofing asphalts and that commences construction or modification after May 26, 1981, is subject to the requirements of this subpart.

§ 60.471 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

Afterburner (A/B) means an exhaust gas incinerator used to control emissions of particulate matter.

Asphalt processing means the storage and blowing of asphalt.

Asphalt processing plant means a plant which blows asphalt for use in the manufacture of asphalt products.

Asphalt roofing plant means a plant which produces asphalt roofing products (shingles, roll roofing, siding, or saturated felt).

Asphalt storage tank means any tank used to store asphalt at asphalt roofing plants, petroleum refineries, and asphalt processing plants. Storage tanks containing cutback asphalts (asphalts diluted with solvents to reduce viscosity for low temperature applications) and emulsified asphalts (asphalts dispersed in water with an emulsifying agent) are not subject to this regulation.

Blowing still means the equipment in which air is blown through asphalt flux to change the softening point and penetration rate.

Catalyst means a substance which, when added to asphalt flux in a blowing still, alters the penetrating-softening point relationship or increases the rate of oxidation of the flux.

Coating blow means the process in which air is blown through hot asphalt flux to produce coating asphalt. The coating blow starts when the air is turned on and stops when the air is turned off.

Electrostatic precipitator (ESP) means an air pollution control device in which solid or liquid particulates in a gas stream are charged as they pass through an electric field and precipitated on a collection surface.

High velocity air filter (HVAF) means an air pollution control filtration device for the removal of sticky, oily, or liquid aerosol particulate matter from exhaust gas streams.

Mineral handling and storage facility means the areas in asphalt roofing plants in which minerals are unloaded from a carrier, the conveyor transfer points between the carrier and the storage silos, and the storage silos.

Saturator means the equipment in which asphalt is applied to felt to make asphalt roofing products. The term saturator includes the saturator, wet looper, and coater.

[47 FR 34143, Aug. 6, 1982, as amended at 65 FR 61762, Oct. 17, 2000]

§ 60.472 Standards for particulate matter.

(a) On and after the date on which §60.8(b) requires a performance test to be completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any saturator:

(1) Particulate matter in excess of:

(i) 0.04 kg/Mg (0.08 lb/ton) of asphalt shingle or mineral-surfaced roll roofing produced, or

(ii) 0.04 kg/Mg (0.08 lb/ton) of saturated felt or smooth-surfaced roll roofing produced;

(2) Exhaust gases with opacity greater than 20 percent; and

(3) Any visible emissions from a saturator capture system for more than 20 percent of any period of consecutive valid observations totaling 60 minutes. Saturators that were constructed before November 18, 1980, and that have not been reconstructed since that date and that become subject to these standards through modification are exempt from the visible emissions standard. Saturators that have been newly constructed or reconstructed since November 18, 1980 are subject to the visible emissions standard.

(b) On and after the date on which §60.8(b) requires a performance test to be completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any blowing still:

(1) Particulate matter in excess of 0.67 kg/Mg (1.3 lb/ton) of asphalt charged to the still when a catalyst is added to the still; and

(2) Particulate matter in excess of 0.71 kg/Mg (1.4 lb/ton) of asphalt charged to the still when a catalyst is added to the still and when No. 6 fuel oil is fired in the afterburner; and

(3) Particulate matter in excess of 0.60 kg/Mg (1.2 lb/ton) of asphalt charged to the still during blowing without a catalyst; and

(4) Particulate matter in excess of 0.64 kg/Mg (1.3 lb/ton) of asphalt charged to the still during blowing without a catalyst and when No. 6 fuel oil is fired in the afterburner; and

(5) Exhaust gases with an opacity greater than 0 percent unless an opacity limit for the blowing still when fuel oil is used to fire the afterburner has been established by the Administrator in accordance with the procedures in §60.474(g).

(c) Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, no owner or operator subject to the provisions of this subpart 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 in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from any asphalt storage tank(s) are ducted to a control device for a saturator, the combined emissions shall meet

the emission limit contained in paragraph (a) of this section during the time the saturator control device is operating. At any other time the asphalt storage tank(s) must meet the opacity limit specified above for storage tanks.

(d) Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any mineral handling and storage facility emissions with opacity greater than 1 percent.

[47 FR 34143, Aug. 6, 1982, as amended at 65 FR 61762, Oct. 17, 2000]

§ 60.473 Monitoring of operations.

(a) The owner or operator subject to the provisions of this subpart, and using either an electrostatic precipitator or a high velocity air filter to meet the emission limit in §60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature of the gas at the inlet of the control device. The temperature monitoring instrument shall have an accuracy of ± 15 °C (± 25 °F) over its range.

(b) The owner or operator subject to the provisions of this subpart and using an afterburner to meet the emission limit in §60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature in the combustion zone of the afterburner. The monitoring instrument shall have an accuracy of ± 10 °C (± 18 °F) over its range.

(c) An owner or operator subject to the provisions of this subpart and using a control device not mentioned in paragraphs (a) or (b) of this section shall provide to the Administrator information describing the operation of the control device and the process parameter(s) which would indicate proper operation and maintenance of the device. The Administrator may require continuous monitoring and will determine the process parameters to be monitored.

(d) The industry is exempted from the quarterly reports required under §60.7(c). The owner/operator is required to record and report the operating temperature of the control device during the performance test and, as required by §60.7(d), maintain a file of the temperature monitoring results for at least two years.

[47 FR 34143, Aug. 6, 1982, as amended at 65 FR 61762, Oct. 17, 2000]

§ 60.474 Test methods and procedures.

(a) For saturators, the owner or operator shall conduct performance tests required in §60.8 as follows:

(1) If the final product is shingle or mineral-surfaced roll roofing, the tests shall be conducted while 106.6-kg (235-lb) shingle is being produced.

(2) If the final product is saturated felt or smooth-surfaced roll roofing, the tests shall be conducted while 6.8-kg (15-lb) felt is being produced.

(3) If the final product is fiberglass shingle, the test shall be conducted while a nominal 100-kg (220-lb) shingle is being produced.

(b) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).

(c) The owner or operator shall determine compliance with the particulate matter standards in §60.472 as follows:

(1) The emission rate (E) of particulate matter shall be computed for each run using the following equation:

$$E=(C_s Q_{sd})/(PK)$$

where:

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

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

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

P=asphalt roofing production rate or asphalt charging rate, Mg/hr (ton/hr).

K=conversion factor, 1000 g/kg [7000 (gr/lb)].

(2) Method 5A shall be used to determine the particulate matter concentration (c_s) and volumetric flow rate (Q_{sd}) of the effluent gas. For a saturator, the sampling time and sample volume for each run shall be at least 120 minutes and 3.00 dscm (106 dscf), and for the blowing still, at least 90 minutes or the duration of the coating blow or non-coating blow, whichever is greater, and 2.25 dscm (79.4 dscf).

(3) For the saturator, the asphalt roofing production rate (P) for each run shall be determined as follows: The amount of asphalt roofing produced on the shingle or saturated felt process lines shall be obtained by direct measurement. The asphalt roofing production rate is the amount produced divided by the time taken for the run.

(4) For the blowing still, the asphalt charging rate (P) shall be computed for each run using the following equation:

$$P=(Vd)/(K' \Theta)$$

where:

P=asphalt charging rate to blowing still, Mg/hr (ton/hr).

V=volume of asphalt charged, m^3 (ft^3).

d=density of asphalt, kg/m^3 (lb/ft^3).

K'=conversion factor, 1000 kg/Mg (2000 lb/ton).

Θ =duration of test run, hr.

(i) The volume (V) of asphalt charged shall be measured by any means accurate to within 10 percent.

(ii) The density (d) of the asphalt shall be computed using the following equation:

$$d = K_1 - K_2 T_i$$

Where:

d = Density of the asphalt, kg/m^3 (lb/ft^3)

K_1 = 1056.1 kg/m^3 (metric units)

= 64.70 lb/ft^3 (English Units)

$K_2 = 0.6176 \text{ kg}/(\text{m}^3 \text{ }^\circ\text{C})$ (metric units)

$= 0.0694 \text{ lb}/(\text{ft}^3 \text{ }^\circ\text{F})$ (English Units)

T_i = temperature at the start of the blow, $^\circ\text{C}$ ($^\circ\text{F}$)

(5) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(d) The Administrator will determine compliance with the standards in §60.472(a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with §60.8(c)) totaling 60 minutes. A performance test shall consist of one run.

(e) The owner or operator shall use the monitoring device in §60.473 (a) or (b) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results.

(f) If at a later date the owner or operator believes that the emission limits in §60.472(a) and (b) are being met even though one of the conditions listed in this paragraph exist, he may submit a written request to the Administrator to repeat the performance test and procedure outlined in paragraph (c) of this section.

(1) The temperature measured in accordance with §60.473(a) is exceeding that measured during the performance test.

(2) The temperature measured in accordance with §60.473(b) is lower than that measured during the performance test.

(g) If fuel oil is to be used to fire an afterburner used to control emissions from a blowing still, the owner or operator may petition the Administrator in accordance with §60.11(e) of the General Provisions to establish an opacity standard for the blowing still that will be the opacity standard when fuel oil is used to fire the afterburner. To obtain this opacity standard, the owner or operator must request the Administrator to determine opacity during an initial, or subsequent, performance test when fuel oil is used to fire the afterburner. Upon receipt of the results of the performance test, the Administrator will make a finding concerning compliance with the mass standard for the blowing still. If the Administrator finds that the facility was in compliance with the mass standard during the performance test but failed to meet the zero opacity standard, the Administrator will establish and promulgate in the Federal Register an opacity standard for the blowing still that will be the opacity standard when fuel oil is used to fire the afterburner. When the afterburner is fired with natural gas, the zero percent opacity remains the applicable opacity standard.

[54 FR 6677, Feb. 14, 1989, as amended 54 FR 27016, June 27, 1989; 65 FR 61762, Oct. 17, 2000]

Title 40: Protection of Environment

Subpart AAAAAAA—National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing

Source: 74 FR 63260, Dec. 2, 2009, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11559 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an asphalt processing operation and/or asphalt roofing manufacturing operation that is an area source of hazardous air pollutant (HAP) emissions, as defined in §63.2.

(b) This subpart applies to each new or existing affected source as defined in paragraphs (b)(1) and (b)(2) of this section.

(1) *Asphalt processing.* The affected source for asphalt processing operations is the collection of all blowing stills, as defined in §63.11566, at an asphalt processing operation.

(2) *Asphalt roofing manufacturing.* The affected source for asphalt roofing manufacturing operations is the collection of all asphalt coating equipment, as defined in §63.11566, at an asphalt roofing manufacturing operation.

(c) This subpart does not apply to hot mix asphalt plant operations that are used in the paving of roads or hardstand, or operations where asphalt may be used in the fabrication of a built-up roof.

(d) An affected source is a new affected source if you commenced construction or reconstruction after July 9, 2009.

(e) An affected source is reconstructed if it meets the criteria as defined in §63.2.

(f) An affected source is an existing source if it is not new or reconstructed.

(g) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act.

(h) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§ 63.11560 What are my compliance dates?

(a) If you own or operate an existing affected source, you must be in compliance with the applicable provisions in this subpart no later than December 2, 2010. As specified in §63.11562(f), you must demonstrate initial compliance within 180 calendar days after December 2, 2010.

(b) If you own or operate a new affected source, you must be in compliance with the provisions in this subpart on or before December 2, 2009 or upon startup, whichever date is later. As specified in §63.11562(g), you must demonstrate initial compliance with the applicable emission limits no later than 180 calendar days after December 2, 2009 or within 180 calendar days after startup of the source, whichever is later.

Standards and Compliance Requirements

§ 63.11561 What are my standards and management practices?

- (a) For asphalt processing operations, you must meet the emission limits specified in Table 1 of this subpart.
- (b) For asphalt roofing manufacturing lines, you must meet the applicable emission limits specified in Table 2 of this subpart.
- (c) These standards apply at all times.

§ 63.11562 What are my initial compliance requirements?

- (a) For asphalt processing operations, you must:
 - (1) Demonstrate initial compliance with the emission limits specified in Table 1 of this subpart by:
 - (i) Conducting emission tests using the methods specified in Table 3 of this subpart; or
 - (ii) Using the results of a previously-conducted emission test as specified in paragraph (d) of this section.
 - (2) Establish the value or range of values of the operating parameters specified in Table 4 of this subpart:
 - (i) Using the operating parameter data recorded during the compliance emission tests; or
 - (ii) Using the operating parameter data recorded during a previously-conducted emission test.
- (b) For asphalt roofing manufacturing lines that use a control device to comply with the emission limits in Table 2 of this subpart, you must:
 - (1) Demonstrate initial compliance by:
 - (i) Conducting emission tests using the methods specified in Table 3 of this subpart; or
 - (ii) Using the results of a previously-conducted emission test as specified in paragraph (d) of this section.
 - (2) Establish the value of the operating parameter specified in Table 4 of this subpart for thermal oxidizers:
 - (i) Using the operating parameter data recorded during the compliance emission tests; or
 - (ii) Using the operating parameter data recorded during a previously-conducted emission test.
 - (3) Establish the value or range of values of the operating parameters specified in Table 4 of this subpart for control devices other than thermal oxidizers:
 - (i) Using the operating parameter data recorded during the compliance emission tests;
 - (ii) Using the operating parameter data recorded during a previously-conducted emission test; or
 - (iii) Using manufacturer performance specifications.
- (c) For asphalt roofing manufacturing lines that do not require a control device to comply with the emission limits in Table 2 of this subpart, you must:
 - (1) Demonstrate initial compliance by:

- (i) Conducting emission tests using the methods specified in Table 3 of this subpart,
 - (ii) Using the results of a previously-conducted emission test as specified in paragraph (d) of this section; or
 - (iii) Using process knowledge and engineering calculations as specified in paragraph (e) of this section.
- (2) Establish the value or range of values of the operating parameters specified in Table 4 of this subpart:
- (i) Using the operating parameter data recorded during the compliance emission tests;
 - (ii) Using the operating parameter data recorded during a previously-conducted emission test; or
 - (iii) Using process knowledge and engineering calculations as specified in paragraph (f) of this section.
- (d) If you are using a previously-conducted emission test to demonstrate compliance with the emission limitations in this subpart for existing sources, as specified in paragraphs (a)(1)(ii), (b)(1)(ii), or (c)(1)(ii) of this section, the following conditions must be met:
- (1) The emission test was conducted within the last 5 years;
 - (2) No changes have been made to the process since the time of the emission test;
 - (3) The operating conditions and test methods used for the previous test conform to the requirements of this subpart; and
 - (4) The data used to establish the value or range of values of the operating parameters, as specified in paragraphs (a)(2)(ii), (b)(2)(ii), or (c)(2)(ii) of this section, were recorded during the emission test.
- (e) If you are using process knowledge and engineering calculations to demonstrate initial compliance as specified in paragraph (c)(1)(iii) of this section, you must prepare written documentation that contains the data and any assumptions used to calculate the process emission rate that demonstrate compliance with the emission limits specified in Table 2 of this subpart.
- (f) If you are using process knowledge and engineering calculations to establish the value or range of values of operating parameters as specified in paragraph (c)(2)(iii) of this section, you must prepare written documentation that contains the data and any assumptions used to show that the process parameters and corresponding parameter values correlate to the process emissions.
- (g) For existing sources, you must demonstrate initial compliance no later than 180 calendar days after December 2, 2010.
- (h) For new sources, you must demonstrate initial compliance no later than 180 calendar days after December 2, 2009 or within 180 calendar days after startup of the source, whichever is later.
- (i) For emission tests conducted to demonstrate initial compliance with the emission limits specified in Tables 1 and 2 of this subpart, you must follow the requirements specified in paragraphs (i)(1) through (i)(4) of this section.
- (1) You must conduct the tests while manufacturing the product that generates the greatest PAH and PM emissions to the control device inlet, or exiting the process if you are not using a control device to comply with the emissions limits specified in Tables 1 and 2 of this subpart.
 - (2) You must conduct a minimum of three separate test runs for each compliance test specified in paragraphs (a)(1)(i), (b)(1)(i), and (c)(1)(i) of this section according to the requirements specified in §63.7(e)(3). The sampling time and sample volume of each test run must be as follows:

(i) For asphalt processing operations, the sampling time and sample volume for each test run must be at least 90 minutes or the duration of the coating blow or non-coating blow, whichever is greater, and 2.25 dscm (79.4 dscf).

(ii) For asphalt coating operations, the sampling time and sample volume for each test run must be at least 120 minutes and 3.00 dscm (106 dscf).

(3) For asphalt processing operations, you must use the following equations to calculate the asphalt charging rate (P).

$$(i) P = (Vd)/(K' \Theta)$$

Where:

P = asphalt charging rate to blowing still, Mg/hr (ton/hr).

V = volume of asphalt charged, m³ (ft³).

d = density of asphalt, kg/m³ (lb/ft³).

K' = conversion factor, 1000 kg/Mg (2000 lb/ton).

Θ = duration of test run, hr.

$$(ii) d = K_1 - K_2 T_i$$

Where:

d = Density of the asphalt, kg/m³ (lb/ft³)

$$d = K_1 - K_2 T_i$$

K₁ = 1056.1 kg/m³ (metric units)

= 66.6147 lb/ft³ (English Units)

K₂ = 0.6176 kg/(m³ °C) (metric units)

= 0.02149 lb/(ft³ °F) (English Units)

T_i = temperature at the start of the blow, °C (°F)

(4) You must use the following equation to demonstrate compliance with the emission limits specified in Table 2 of this subpart:

$$E = [(C)*(Q)/(P)*(K)]$$

Where:

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

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

Q = volumetric flow rate of effluent gas, dscm/hr (dscf/hr).

P = the average asphalt roofing production rate or asphalt charging rate over the duration of the test, Mg/hr (ton/hr).

K = conversion factor, 1000 g/kg [7000 (gr/lb)].

§ 63.11563 What are my monitoring requirements?

(a) You must maintain the operating parameters established under §63.11562(a)(2), (b)(2), (b)(3), and (c)(2) as specified in Table 4 of this subpart.

(b) If you are using a control device to comply with the emission limits specified in Tables 1 and 2 of this subpart, you must develop and make available for inspection by the delegated authority, upon request, a site-specific monitoring plan for each monitoring system that addresses the following:

(1) Installation of the CPMS probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);

(2) Performance and equipment specifications for the probe or interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction system; and

(3) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

(i) In your site-specific monitoring plan, you must also address the following:

(A) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (c)(3), (c)(4)(ii), (c)(7), and (c)(8);

(B) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and

(C) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c), (e)(1), and (e)(2)(i).

(c) If you are using a control device to comply with the emission limits specified in Tables 1 and 2 of this subpart, you must install, operate, and maintain a continuous parameter monitoring system (CPMS) as specified in paragraphs (c)(1) through (c)(3) of this section.

(1) The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period.

(2) To determine the 3-hour average, you must:

(i) Have a minimum of four successive cycles of operation to have a valid hour of data.

(ii) Have valid data from at least three of four equally spaced data values for that hour from a CPMS that is not out-of-control according to your site-specific monitoring plan.

(iii) Determine the 3-hour average of all recorded readings for each operating day, except as stated in paragraph (g) of this section. You must have at least two of the three hourly averages for that period using only hourly average values that are based on valid data (i.e., not from out-of-control periods).

(3) You must record the results of each inspection, calibration, and validation check of the CPMS.

(d) For each temperature monitoring device, you must meet the CPMS requirements in paragraphs (c)(1) through (c)(3) of this section and the following requirements:

- (1) Locate the temperature sensor in a position that provides a representative temperature.
- (2) For a noncryogenic temperature range, use a temperature sensor with a minimum measurement sensitivity of 2.8 °C or 1.0 percent of the temperature value, whichever is larger.
- (3) If a chart recorder is used, the recorder sensitivity in the minor division must be at least 20 °F.
- (4) Perform an accuracy check at least semiannually or following an operating parameter deviation:
 - (i) According to the procedures in the manufacturer's documentation; or
 - (ii) By comparing the sensor output to redundant sensor output; or
 - (iii) By comparing the sensor output to the output from a calibrated temperature measurement device; or
 - (iv) By comparing the sensor output to the output from a temperature simulator.
- (5) Conduct accuracy checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- (6) At least quarterly or following an operating parameter deviation, perform visual inspections of components if redundant sensors are not used.

(e) For each pressure measurement device, you must meet the CPMS requirements of paragraphs (e)(1) through (e)(6) of this section and the following requirements:

- (1) Locate the pressure sensor(s) in, or as close as possible, to a position that provides a representative measurement of the pressure.
 - (2) Use a gauge with a minimum measurement sensitivity of 0.12 kiloPascals or a transducer with a minimum measurement sensitivity of 5 percent of the pressure range.
 - (3) Check pressure tap for blockage daily. Perform an accuracy check at least quarterly or following an operating parameter deviation:
 - (i) According to the manufacturer's procedures; or
 - (ii) By comparing the sensor output to redundant sensor output.
 - (4) Conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range or install a new pressure sensor.
 - (5) At least monthly or following an operating parameter deviation, perform a leak check of all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.
 - (6) At least quarterly or following an operating parameter deviation, perform visible inspections on all components if redundant sensors are not used.
- (f) For each electrostatic precipitator (ESP) used to control emissions, you must install and operate a CPMS that meets the requirements of paragraphs (c)(1) through (c)(3) of this section to provide representative measurements of the voltage supplied to the ESP.

(g) If you are not using a control device to comply with the emission limits specified in Tables 1 and 2 of this subpart, you must develop and make available for inspection by the delegated authority, upon request, a site-specific monitoring plan. The plan must specify the process parameters established during the initial compliance assessment and how they are being monitored and maintained to demonstrate continuous compliance.

(h) If you would like to use parameters or means other than those specified in Table 4 of this subpart to demonstrate continuous compliance with the emission limits specified in Tables 1 and 2 of this subpart, you must apply to the Administrator for approval of an alternative monitoring plan under §63.8(f). The plan must specify how process parameters established during the initial compliance assessment will be monitored and maintained to demonstrate continuous compliance.

(i) At all times the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(j) You must conduct a performance evaluation of each CPMS in accordance with your site-specific monitoring plan.

(k) You must operate and maintain the CPMS in continuous operation according to the site-specific monitoring plan.

[74 FR 63260, Dec. 2, 2009, as amended at 75 FR 12989, Mar. 18, 2010]

§ 63.11564 What are my notification, recordkeeping, and reporting requirements?

(a) You must submit the notifications specified in paragraphs (a)(1) through (a)(6) of this section.

(1) You must submit all of the notifications in §§63.5(b), 63.7(b); 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply to you by the dates specified in those sections.

(2) As specified in §63.9(b)(2), if you have an existing affected source, you must submit an Initial Notification not later than 120 calendar days after December 2, 2009.

(3) As specified in §63.9(b)(4) and (5), if you have a new affected source, you must submit an Initial Notification not later than 120 calendar days after you become subject to this subpart.

(4) You must submit a notification of intent to conduct a compliance test at least 60 calendar days before the compliance test is scheduled to begin, as required in §63.7(b)(1).

(5) You must submit a Notification of Compliance Status according to §63.9(h)(2)(ii). You must submit the Notification of Compliance Status, including the compliance test results, before the close of business on the 60th calendar day following the completion of the compliance test according to §63.10(d)(2).

(6) If you are using data from a previously-conducted emission test to serve as documentation of compliance with the emission standards and operating limits of this subpart, you must submit the test data in lieu of the initial compliance test results with the Notification of Compliance Status required under paragraph (a)(5) of this section.

(b) You must submit a compliance report as specified in paragraphs (b)(1) through (b)(4) of this section.

(1) If you are using a control device to comply with the emission limits, the compliance report must identify the controlled units (e.g., blowing stills, saturators, coating mixers, coaters). If you are not using a control device to comply with the emission limits, the compliance report must identify the site-specific process operating parameters monitored to determine compliance with the emission limits.

(2) During periods for which there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, the compliance report must contain the information specified in paragraphs (b)(2)(i) through (b)(2)(v) of this section.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) A statement that there were no deviations from the emission limitations during the reporting period.

(v) If there were no periods during which the CPMS was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which the CPMS was out-of-control during the reporting period.

(3) For each deviation from an emission limitation (emission limit and operating limit), you must include the information in paragraphs (b)(3)(i) through (b)(3)(xii) of this section.

(i) The date and time that each deviation started and stopped.

(ii) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.

(iii) The date, time and duration that each CPMS was out-of-control, including the information in §63.8(c)(8).

(iv) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(v) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(vi) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(vii) A summary of the total duration of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that reporting period.

(viii) An identification of each air pollutant that was monitored at the affected source.

(ix) A brief description of the process units.

(x) A brief description of the CPMS.

(xi) The date of the latest CPMS certification or audit.

(xii) A description of any changes in CPMS or controls since the last reporting period.

(4) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report specified in paragraph (b) of this section according to the following dates:

(i) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.11560 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.11560.

(ii) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.11560.

(iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(c) You must maintain the records specified in paragraphs (c)(1) through (c)(10) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) Copies of emission tests used to demonstrate compliance and performance evaluations as required in §63.10(b)(2)(viii).

(3) Documentation that shows that the following conditions are true if you use a previously-conducted emission test to demonstrate initial compliance as specified in §63.11562(a)(1)(ii), (b)(1)(ii), and (c)(1)(ii):

(i) The test was conducted within the last 5 years;

(ii) No changes have been made to the process since the time of the emission test;

(iii) The operating conditions and test methods used for the previous test conform to the requirements of this subpart; and

(iv) The data used to establish the value or range of values of the operating parameters, as specified in §63.11562(a)(2)(ii), (b)(2)(ii), or (c)(2)(ii), were recorded during the emission test.

(4) Documentation that identifies the operating parameters and values specified in Table 4 of this subpart and that contains the data used to establish the parameter values as specified in §63.11562(a)(2), (b)(2), (b)(3), or (c)(2).

(5) Copies of the written manufacturers performance specifications used to establish operating parameter values as specified in §63.11562(b)(3)(iii).

(6) Documentation of the process knowledge and engineering calculations used to demonstrate initial compliance as specified in §63.11562(e).

(7) Documentation of the process knowledge and engineering calculations used to establish the value or range of values of operating parameters as specified in §63.11562(f).

(8) A copy of the site-specific monitoring plan required under §63.11563(b) or (g).

(9) A copy of the approved alternative monitoring plan required under §63.11563(h), if applicable.

(10) Records of the operating parameter values required in Table 4 of this subpart to show continuous compliance with each operating limit that applies to you.

[74 FR 63260, Dec. 2, 2009, as amended at 75 FR 12989, Mar. 18, 2010]

Other Requirements and Information

§ 63.11565 What general provisions sections apply to this subpart?

You must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 5 of this subpart.

§ 63.11566 What definitions apply to this subpart?

Asphalt coating equipment means the saturators, coating mixers, and coaters used to apply asphalt to substrate to manufacture roofing products (e.g., shingles, roll roofing).

Asphalt flux means the organic residual material from distillation of crude oil that is generally used in asphalt roofing manufacturing and paving and non-paving asphalt products.

Asphalt processing operation means any operation engaged in the preparation of asphalt flux at stand-alone asphalt processing facilities, petroleum refineries, and asphalt roofing facilities. Asphalt preparation, called “blowing,” is the oxidation of asphalt flux, achieved by bubbling air through the heated asphalt, to raise the softening point and to reduce penetration of the oxidized asphalt. An asphalt processing facility includes one or more asphalt flux blowing stills.

Asphalt roofing manufacturing operation means the collection of equipment used to manufacture asphalt roofing products through a series of sequential process steps. The equipment configuration of an asphalt roofing manufacturing process varies depending upon the type of substrate used (i.e., organic or inorganic). For example, an asphalt roofing manufacturing line that uses organic substrate (e.g., felt) typically would consist of a saturator (and wet looper), coating mixer, and coater (although the saturator could be bypassed if the line manufacturers multiple types of products). An asphalt roofing manufacturing line that uses inorganic (fiberglass mat) substrate typically would consist of a coating mixer and coater.

Blowing still means the equipment in which air is blown through asphalt flux to change the softening point and penetration rate of the asphalt flux, creating oxidized asphalt.

Built-up roofing operations means operations involved in the on-site (e.g., at a commercial building) assembly of roofing system components (e.g., asphalt, substrate, surface granules).

Coater means the equipment used to apply amended (filled or modified) asphalt to the top and bottom of the substrate (typically fiberglass mat) used to manufacture shingles and rolled roofing products.

Coating mixer means the equipment used to mix coating asphalt and a mineral stabilizer, prior to applying the stabilized coating asphalt to the substrate.

Hot-mix asphalt operation means operations involved in mixing asphalt cement and aggregates to produce materials for paving roadways and hardstand (e.g., vehicle parking lots, prepared surfaces for materiel storage).

Particulate matter (PM) means, for the purposes of this subpart, includes any material determined gravimetrically using EPA Method 5A—Determination of Particulate Matter Emissions From the Asphalt Processing And Asphalt Roofing Industry (40 CFR part 60, appendix A–3).

Responsible official is defined in §63.2.

Saturator means the equipment used to impregnate a substrate (predominantly organic felt) with asphalt. Saturators are predominantly used for the manufacture of rolled-roofing products (e.g., saturated felt). For the purposes of this subpart, the term saturator includes impregnation vat and wet looper.

Wet looper means the series of rollers typically following the saturator used to provide additional absorption time for asphalt to penetrate the roofing substrate.

§ 63.11567 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (U.S. EPA), or a delegated authority such as your State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to your State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. You should contact your U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under 40 CFR part 63, subpart E, the following authorities are retained by the Administrator of U.S. EPA:

- (1) Approval of alternatives to the requirements in §§63.11559, 63.11560, 63.11561, 63.11562, and 63.11563.
- (2) Approval of major changes to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.
- (3) Approval of major changes to monitoring under §63.8(f) and as defined in §63.90.
- (4) Approval of major changes to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

Table 1 of Subpart AAAAAAA of Part 63—Emission Limits for Asphalt Processing (Refining) Operations

For * * *	You must meet the following emission limits * * *
1. Blowing stills	a. Limit PAH emissions to 0.003 lb/ton of asphalt charged to the blowing stills; or
	b. Limit PM emissions to 1.2 lb/ton of asphalt charged to the blowing stills.

Table 2 of Subpart AAAAAAA of Part 63—Emission Limits for Asphalt Roofing Manufacturing (Coating) Operations

For * * *	
1. Coater-only production lines	a. Limit PAH emissions to 0.0002 lb/ton of asphalt roofing product manufactured; or
	b. Limit PM emissions to 0.06 lb/ton of asphalt roofing product manufactured.
2. Saturator-only production lines	a. Limit PAH emissions to 0.0007 lb/ton of asphalt roofing product manufactured; or
	b. Limit PM emissions to 0.30 lb/ton of asphalt roofing product manufactured.
3. Combined saturator/coater production lines	a. Limit PAH emissions to 0.0009 lb/ton of asphalt roofing product manufactured; or
	b. Limit PM emissions to 0.36 lb/ton of asphalt roofing product manufactured.

Table 3 of Subpart AAAAAAA of Part 63—Test Methods

For * * *	You must use * * *
1. Selecting the sampling locations ^a and the number of traverse points	EPA test method 1 or 1A in appendix A to part 60.
2. Determining the velocity and volumetric flow rate	EPA test method 2, 2A, 2C, 2D, 2F, or 2G, as appropriate, in appendix A to part 60.
3. Determining the gas molecular weight used for flow rate determination	EPA test method 3, 3A, 3B, as appropriate, in appendix A to part 60.
4. Measuring the moisture content of the stack gas	EPA test method 4 in appendix A to part 60.
5. Measuring the PM emissions	EPA test method 5A in appendix A to part 60.
6. Measuring the PAH emissions	EPA test method 23 ^b with analysis by SW-846 Method 8270D.

^aThe sampling locations must be located at the outlet of the process equipment (or control device, if applicable), prior to any releases to the atmosphere.

^bWhen using EPA Method 23, the toluene extraction step specified in section 3.1.2.1 of the method should be omitted.

Table 4 of Subpart AAAAAAA of Part 63—Operating Limits

If you comply with the emission limits using * * *	You must establish an operating value for * * *	And maintain^a * * *
1. A thermal oxidizer	Combustion zone temperature	The 3-hour average combustion zone temperature at or above the operating value established as specified in §63.11562(a)(2) and (b)(2).
2. A high-efficiency air filter or fiber bed filter	a. Inlet gas temperature ^b , and b. Pressure drop across device ^b	The 3-hour average inlet gas temperature within the operating range established as specified in §63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device within the approved operating range established as specified in §63.11562(a)(2) and (b)(3).
3. An electrostatic precipitator (ESP)	Voltage ^c to the ESP	The 3-hour average ESP voltage ^c at or above the approved operating value established as specified in §63.11562(a)(2) and (b)(3).
4. Process modifications (<i>i.e.</i> , a control device is not required)	Appropriate process monitoring parameters. ^d	The monitoring parameters within the operating values established as specified in §63.11562(c)(2).

^aThe 3-hour averaging period applies at all times other than startup and shutdown, as defined in §63.2. Within 24 hours of a startup event, or 24 hours prior to a shutdown event, you must normalize the emissions that occur during the startup or shutdown, when there is no production rate available to assess compliance with the lb/ton of product emission limits, with emissions that occur when the process is operational. The emissions that occur during the startup or shutdown event must be included with the process emissions when assessing compliance with the emission limits specified in Tables 1 and 2 of this subpart.

^bAs an alternative to monitoring the inlet gas temperature and pressure drop, you can use a leak detection system that identifies when the filter media has been comprised.

^cAs an alternative to monitoring the ESP voltage, you can monitor the ESP instrumentation (e.g. light, alarm) that indicates when the ESP must be cleaned and maintain a record of the instrumentation on an hourly basis. Failure to service the ESP within one hour of the indication is an exceedance of the applicable monitoring requirements specified in §63.11563(a).

^dIf you are not using a control device to comply with the emission limits specified in Table 2 of this subpart, the process parameters and corresponding parameter values that you select to demonstrate continuous compliance must correlate to the process emissions.

Table 5 of Subpart AAAAAAA of Part 63—Applicability of General Provisions to Subpart AAAAAAA

Citation	Subject	Applies to subpart AAAAAAA
§63.1	Applicability	Yes.
§63.2	Definitions	Yes.
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities	Yes.
§63.5	Construction/Reconstruction	Yes.
§63.6(a)–(d)	Compliance With Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	Operation and Maintenance Requirements	No.
§63.6(e)(1)(ii)	Operation and Maintenance Requirements	No.
§63.6(e)(1)(iii)	Operation and Maintenance Requirements	Yes.
§63.6(e)(2)	[Reserved]	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No. Subpart AAAAAAA does not require startup, shutdown, and malfunction plans.
§63.6(f)(1)	Compliance with Nonopacity Emission Standards	No. The emission limits apply at all times.
§63.6(f)(2)–(3)	Methods for Determining Compliance and Finding of Compliance	Yes.

§63.6(h)	Opacity/Visible Emission (VE) Standards	No. Subpart AAAAAAA does not contain opacity or VE standards.
§63.6(i)	Compliance Extension	Yes.
§63.6(j)	Presidential Compliance Exemption	Yes.
§63.7(a)–(d)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Performance Testing Requirements	No. Subpart AAAAAAA specifies the conditions under which performance tests must be conducted.
§63.7(e)(2)–(4)	Conduct of Performance Tests and Data Reduction	Yes.
§63.7(f)–(h)	Use of Alternative Test Method; Data Analysis, Recordkeeping, and Reporting; and Waiver of Performance Tests	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Yes.
§63.8(a)(2)	Performance Specifications	No. Subpart AAAAAAA does not allow CEMS.
§63.8(a)(3)	[Reserved]	
§63.8(a)(4)	Monitoring with Flares	Yes.
§63.8(b)(1)	Conduct of Monitoring	Yes.
§63.8(b)(2)–(3)	Multiple Effluents and Multiple Monitoring Systems	Yes.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Yes.
§63.8(c)(1)(i)	CMS maintenance	Yes.
§63.8(c)(1)(ii)	Spare Parts for CMS Malfunction	Yes.
§63.8(c)(1)(iii)	Compliance with Operation and Maintenance Requirements	No. Subpart AAAAAAA does not require startup, shutdown, and malfunction plans.
§63.8(c)(2)–(3)	Monitoring System Installation	Yes.
§63.8(c)(4)	CMS Requirements	No; §63.11563 specifies the CMS requirements.
§63.8(c)(5)	COMS Minimum Procedures	No. Subpart AAAAAAA does not contain opacity or VE

		standards.
§63.8(c)(6)	CMS Requirements	No; §63.11563 specifies the CMS requirements.
§63.8(c)(7)–(8)	CMS Requirements	Yes.
§63.8(d)	CMS Quality Control	No; §63.11563 specifies the CMS requirements.
§63.8(e)–(f)	CMS Performance Evaluation	Yes.
§63.8(g)(1)–(4)	Data Reduction Requirements	Yes.
§63.8(g)(5)	Data to Exclude from Averaging	No. All monitoring data must be included when calculating averages.
§63.9	Notification Requirements	Yes.
§63.10(a)	Recordkeeping and Reporting Requirements—Applicability	Yes.
§63.10(b)(1)	General Recordkeeping Requirements	Yes.
§63.10(b)(2)(i)–(iii)	General Recordkeeping Requirements	Yes.
§63.10(b)(2)(iv)–(v)	Records of Actions Taken During Startup, Shutdown, and Malfunction Plans	No. Subpart AAAAAAA does not require startup, shutdown, and malfunction plans.
§63.10(b)(2)(vi)–(xiv)	General Recordkeeping Requirements	Yes.
§63.10(c)(1)–(14)	Additional Recordkeeping Requirements for Sources with Continuous Monitoring Systems	Yes.
§63.10(c)(15)	Additional Recordkeeping Requirements for Sources with Continuous Monitoring Systems	No. Subpart AAAAAAA does not require startup, shutdown, and malfunction plans.
§63.10(d)(1)–(4)	General Reporting Requirements	Yes.
§63.10(d)(5)	Periodic Startup, Shutdown, and Malfunction Reports	No. Subpart AAAAAAA does not require startup, shutdown, and malfunction plans.
§63.10(e)	Additional Reporting Requirements for Sources with Continuous Monitoring Systems	Yes.
§63.10(f)	Waiver of Recordkeeping or Reporting Requirements	Yes.

§63.11	Control Device and Work Practice Requirements	Yes.
§63.12	State Authority and Delegations	Yes.
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes.
§63.14	Incorporations by Reference	Yes.
§63.15	Availability of Information and Confidentiality	Yes.
§63.16	Performance Track Provisions	No.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Transitioning to a Registration

Source Description and Location

Source Name:	Firestone Building Products Company
Source Location:	3525 South Arlington Avenue, Indianapolis, IN 46203
County:	Marion
SIC Code:	2952 (Asphalt Felts and Coatings)
Registration No.:	097-30565-00140
Permit Reviewer:	Jack Harmon

On May 19, 2011, the Office of Air Quality (OAQ) received an application from Firestone Building Products Company related to the transition of a Minor Source Operating Permit (MSOP) to a Registration. The source has removed some production equipment and adjusted production capabilities on other equipment and the potential to emit criteria pollutants has been reduced, allowing for the transition to a Registration.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP Renewal No. 097-23189-00140, issued on May 22, 2008.
- (b) MSOP Notice-Only Change No. 097-27382-00140, issued on February 10, 2009.
- (c) MSOP Notice-Only Change No. 097-27494-00140, issued on March 13, 2009.
- (d) MSOP Notice-Only Change No. 097-29334-00140, issued on July 7, 2010.

Due to this application, the source is transitioning from a MSOP to a Registration.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

Pollutant	Designation
	¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.
	Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as nonattainment in Indiana for all PM_{2.5}. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Firestone Building Products Company on May 19, 2011, related to the transition of a Minor Source Operating Permit (MSOP) to a Registration. The source has removed some production equipment and adjusted production capabilities on other equipment and the potential to emit criteria pollutants has been reduced, allowing for the transition to a Registration.

The following is a list of emission units and pollution control devices that have been removed from the source:

- (b) One (1) Built Up Roofing (BUR) system (Line 2), identified as EU-12, constructed in 1998, with a maximum capacity of 14,182 pounds of asphalt compound per hour, and 13,091 pounds of limestone filler per hour. The system consists of one (1) mixing screw and surge tank, one (1) saturator, or coater, where heated bitumen with limestone filler will be applied to continuously-fed fiberglass, and one (1) sand application process which will apply sand to the surface of the roll roofing (asphalt-saturated fiberglass substrate). The system uses a Monsanto Mist Eliminator (MME) identified as CE-08 for control, and exhausts to a 59-foot stack, identified as Stack 4.
- (e) One (1) limestone receiving bin, identified as EU-14, constructed in 2001, with a maximum capacity of 23,360 tons of limestone usage per year, using one (1) Whirl Airflow 600 cfm dust collector identified as CE-02 for control, and exhausting to Stack 5.
- (h) One (1) 3,470 cubic foot (98.25 cubic meter) oxidized asphalt storage tank, installed in 1998, using a Monsanto Mist Eliminator, (MME) identified as CE-08 for control, and exhausting to a 59-

foot stack, identified as Stack 4, or a Monsanto Mist Eliminator (MME), identified as CE-01 for control, and exhausting to a 59-foot stack, identified as Stack 1.

Note: this emission unit will still be located within the facility, but will be relocated near two other identical tanks already permitted in the facility and will utilize those controls. This change is shown in the section below that discusses modified units.

- (j) One (1) natural gas fired Heatec Thermal Fluid Heater, identified as EU-13, installed in 1989, with a capacity of 6 million Btu per hour, using no controls, and venting to Stack 13.

The following is a list of the modified emission units and pollution control devices:

- (a) One (1) modified bitumen asphalt roofing line (Line 1), identified as EU-01, constructed in 1990, and modified in 2011, with a maximum capacity of 22,603 pounds of asphalt compound per hour, and 13,461 pounds of limestone filler per hour. Mineral products are applied to the surface of the roll roofing (Asphalt-saturated fiberglass substrate). The system consists of three (3) 12-ton capacity mix tanks, one (1) 10-ton capacity mix tank, one (1) 15-ton use tank, and one (1) two section impregnation vat. The system uses a Monsanto Mist Eliminator (MME) identified as CE-01 for control, and exhausts to a 59-foot stack, identified as Stack 1.

The maximum capacity of asphalt compound stated above has been changed from 18,836 pounds per hour in the current permit, and the maximum capacity of limestone filler stated above has been changed from 11,218 pounds per hour in the current permit.

- (b) A third identical tank, previously permitted, will be added to the two existing tanks, and will be controlled by the existing mist eliminators and exhausting to the existing Stack 1. The emission unit listing will be changed from two (2) tanks to three (3) tanks, as follows: Three (3) 3,470 cubic foot (98.25 cubic meters) asphalt storage tanks, with two (2) installed in 1990, and with one (1) installed in 1998 and relocated in 2011, using a Monsanto Mist Eliminator (MME), identified as CE-01 for control, and exhausting to a 59-foot stack, identified as Stack 1.

The following is the revised list of emission units and pollution control devices, after all changes, as they will appear in the permit:

- (a) One (1) modified bitumen asphalt roofing line (Line 1), identified as EU-01, constructed in 1990, with a maximum capacity of 22,603 pounds of asphalt compound per hour, and 13,461 pounds of limestone filler per hour. Mineral products are applied to the surface of the roll roofing (Asphalt-saturated fiberglass substrate). The system consists of three (3) 12-ton capacity mix tanks, one (1) 10-ton capacity mix tank, one (1) 15-ton use tank, and one (1) two section impregnation vat. All of the components of this system use a Monsanto Mist Eliminator (MME) identified as CE-01 for control, and exhausts to a 59-foot stack, identified as Stack 1.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

Under 40 CFR 63, Subpart AAAAAAA (7A), this is considered an affected facility.

- (b) One (1) 100-ton storage silo for calcium carbonate filler material, identified as EU-02, constructed in 1990. Control equipment consists of one (1) Whirl Airflow dust collector identified as CE-04 for control, and exhausts to Stack 2.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (c) One (1) 50-ton capacity sand storage silo, identified as EU-07, handling 10,205 tons of sand per year, constructed in 1994. The silo is equipped with an Ultra Industries baghouse identified as CE-07 for control, and exhausts to Stack 7.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (d) One (1) water based roofing granule treatment system to be applied on the Modified Bituman to continuously-fed fiber glass roofing material to improve the performance and characteristics of roofing granules, approved for construction in 2010, with a maximum capacity of 2 tons/ hour of mineral products, exhausting indoors. All of the components of this system use a cartridge filter system, CE-06, to control particulate emissions and exhaust through stack 6.

The process consists of following equipment:

- (1) one (1) bulk bag to bucket elevator
- (2) one (1) bucket elevator to elevator storage
- (3) one (1) elevated storage to blender
- (4) one (1) mixer to elevated storage
- (5) one (1) elevated storage to bucket elevator
- (6) one (1) drying process
- (7) tote filling operation
- (8) one (1) HEPA cartridge air handling system

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (e) Three (3) 3,470 cubic foot (98.25 cubic meters) asphalt storage tanks, with two (2) installed in 1990, and one (1) installed in 1998, and relocated in 2011, with all three tanks using a Monsanto Mist Eliminator (MME), identified as CE-01 for control, and exhausting to a 59-foot stack, identified as Stack 1.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (f) One (1) 3,370 cubic foot (95.41 cubic meters) liquid polypropylene storage tank, installed in 1990, using no controls.

Under 40 CFR 60 Subpart UU, this is considered an affected facility.

- (g) One (1) natural gas fired Heatec Thermal Fluid Heater, identified as EU-03, installed in 1989, with a capacity of 6 million Btu per hour, using no controls, and venting to Stack 3.
- (h) One (1) natural gas fired Inferno Therm Polyolefin (APP) Heater, identified as EU-08, installed in 1989, with a capacity of 0.8 million Btu per hour, using no controls, and venting to Stack 8.
- (i) Fourteen (14) seasonally used natural gas space heaters, with a combined maximum capacity of 15.2 MMBtu/hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units and pollution control devices at this source.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
EU-01 - Asphalt Roofing Line	2.36	0.51	0.51	0.00	0.00	15.35	0.00	0.00	0.00
EU-02 - Storage Silo	5.61	1.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU-07 Storage Silo	3.67	1.26	1.26	0.00	0.00	0.00	0.00	0.00	0.00
Granule Treatment	4.88	1.23	1.23	0.00	0.00	0.00	0.00	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
EU-03, EU-08 Natural Gas Units	0.06	0.23	0.23	0.02	2.98	0.16	2.50	5.62E-02	5.36E-02 (Hexane)
Seasonal Space Heaters (Number = 14)	0.13	0.51	0.51	0.04	6.66	0.37	5.59	1.26E-01	1.20E-01 (Hexane)
Total PTE of Entire Source	16.71	5.67	5.67	0.06	9.64	15.91	8.09	1.82E-01	1.73E-01 (Hexane)
Registration Levels	25	25	25	25	25	25	100	25	10
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Hot Mix Asphalt Facilities, 40 CFR 60, Subpart I, are not included in the permit, since this source does not meet the definition of a hot mix asphalt facility, as defined in the role. Therefore, the requirements of 40 CFR 60, Subpart I do not apply.
- (b) The requirements of the New Source Performance Standards for Asphalt Processing and Asphalt Roofing Manufacturers (40 CFR 60, Subpart UU) apply to all facilities located at the source that engage in handling, storage, and production of asphalt roofing.

The units subject to this rule include the following:

- (1) EU-01 - Asphalt Roofing Line
- (2) EU-02 - Storage Silo
- (3) EU-07 – Storage Silo
- (4) Three (3) 3,470 cubic foot (98.25 cubic meters) asphalt storage tanks, with two (2) installed in 1990, and one (1) installed in 1998, and relocated in 2011, using a Monsanto Mist Eliminator (MME), identified as CE-01 for control, and exhausting to a 59-foot stack, identified as Stack 1.
- (5) One (1) 3,370 cubic foot (95.41 cubic meters) liquid polypropylene storage tank, installed in 1990, using no controls.

Applicable portions of the NSPS are the following:

- (1) 60.472(a)(1)(i),(ii)
- (2) 60.472(a)(2)
- (3) 60.472(a)(3)
- (4) 60.472(b)(1)
- (5) 60.472(b)(2)
- (6) 60.472(b)(3)
- (7) 60.472(b)(4)
- (8) 60.472(b)(5)
- (9) 60.472(c)
- (10) 60.472(d)
- (11) 60.473(a)
- (12) 60.473(b)
- (13) 60.473(c)
- (14) 60.473(d)
- (15) 60.474(a)(1)
- (16) 60.474(a)(2)
- (17) 60.474(a)(3)
- (18) 60.474(b)
- (19) 60.474(c)(1)
- (20) 60.474(c)(2)
- (21) 60.474(c)(3)
- (22) 60.474(c)(4)(i)
- (23) 60.474(c)(4)(ii)
- (24) 60.474(c)(5)
- (25) 60.474(d)
- (26) 60.474(e)
- (27) 60.474(f)(1)
- (28) 60.474(f)(2)
- (29) 60.474(g)

Pursuant to 40 CFR 60.474(a), this existing affected source must perform testing to demonstrate compliance with the applicable requirements of 40 CFR 60, Subpart UU.

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to these facilities except as otherwise specified in 40 CFR 60, Subpart UU.

This is an existing applicable requirement to the source.

- (c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb, are not included in the permit, since all of the tanks at this facility have a true vapor pressure of less than 15 kilopascals. Therefore, the requirements of 40 CFR 60, Subpart Kb do not apply.
- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR 63, Subpart LLLLLL (5A), because this source is a major sources for HAPs. Therefore, the requirements of 40 CFR 63, Subpart 5L do not apply.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Chemical Preparations Industry (40 CFR 63, Subpart BBBB BBB (7B), because this source does not produce or use any of the target HAPs as defined in 40.63.11588. Therefore, the requirements of 40 CFR 63, Subpart 7B do not apply.
- (g) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Area Sources of Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR 63, Subpart AAAAAAA (7A), because this source is an area sources for HAPs and because it meets the definition of an asphalt roofing manufacturing operation, as defined in 40 CFR 63.2.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11559
- (2) 40 CFR 63.11560(a)
- (3) 40 CFR 63.11561(b) and (c)
- (4) 40 CFR 63.11562
- (5) 40 CFR 63.11563
- (6) 40 CFR 63.11564
- (7) 40 CFR 63.11565
- (8) 40 CFR 63.11566
- (9) 40 CFR 63.11567
- (10) Tables 2, 3, 4, and 5

Pursuant to 40 CFR 63.11560(a), this existing affected source must perform testing to demonstrate compliance with the applicable requirements of 40 CFR 63, Subpart AAAAAAA.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart 7A.

This is a new requirement applicable to the source.

- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (i) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.5 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County)
This source is located in Marion County, is not specifically identified in 326 IAC 6.5-6, and has the unlimited potential to emit particulate of 16.71 tons per year. Therefore, this source is subject to the requirements of 326 IAC 6.5 because the actual PM emissions from the source are not limited to less than 10 tons per year. Therefore, pursuant to 326 IAC 6.5-1-2, particulate emissions from

each of the units shown below are limited as follows:

Emissions Unit	Control Device	326 IAC 6.5 Limit (gr/dscf)
Asphalt roofing line EU-01	Mist Collector MME, CE-01	0.03
Storage Silo EU-02	Dust Collector, CE-04	0.03
Storage Silo EU-07	Dust Collector, CE-07	0.03
Granule Treatment Process	Cartridge Filter System, CE-06	0.03

The control devices, as shown in the above table, shall be in operation at all times that the corresponding emissions units are in operation.

- (h) 326 IAC 6-2-4 (Indirect Heating)
 326 IAC 6-2-4 applies to the 6 MMBtu/hr thermal fluid heater (EU-03) because the heater heats an intermediate fluid to heat the asphalt in the tanks through another heat exchanger. Since the 0.8 MMBtu/hr polyolefin (APP) heater (EU-08) is simply a single heat exchanger inside a tank that does not heat an intermediate fluid, 326 IAC 6-2-4 does not apply. Pursuant to 326 IAC 6-2-4 the PM emissions from EU-03 are limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
 Q = Total source maximum operating capacity rating in million Btu per hour heat input. As each new indirect heater is added to the plant Q will increase.

The value of Q for this facility is 6, therefore the facility is limited to 0.68 pounds of particulate matter per million Btu input. Based on the potential to emit, the source is able to comply with this limit.

- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 This source is not subject to the requirements of 326 IAC 6-3-2 because it is subject to the provisions of 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (k) 326 IAC 8-5-2 (Miscellaneous operations: asphalt paving)
 This facility is not subject to 326 IAC 8-5-2 (Miscellaneous operations: asphalt paving), because the source does not produce asphalt paving.
- (l) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (m) 326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
EU-01/Monsanto Mist Eliminator (MME)	Pressure Drop (3 to 12 inches of water)	Once per day
EU-01/CE-01	Visible Emission Notation	Once per day

- (b) The testing requirements applicable to this source are as follows:

Emission Unit	Control Device	Pollutant	Frequency of Testing
EU-01	CE-01	PM, PM10, PM2.5, VOC	Every five years

Stack testing was last conducted on the asphalt roofing line, EU-01, on November 5, 2008, and serves as the most recent demonstration of compliance. Repeat testing for PM, PM10, PM2.5, and VOC shall be conducted within five (5) years of this most recent demonstration of compliance, and every five (5) years thereafter. Section C - Performance Testing, of the permit contains the Permittee's obligation with regard to Performance testing required in the permit.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 19, 2011.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 097-30565-00140. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
Summary**

**Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011**

Potential to Emit

Emission Unit	PM	PM10/PM2.5	SO₂	NO_x	VOC	CO	Total HAPs	Worst HAP	
EU-01 (Asphalt Roofing Line)	2.36	0.51	0.00	0.00	15.35	0.00	0.0	0.0	
EU-02 (Storage Silo)	5.61	1.93	0.00	0.00	0.00	0.00	0.0	0.0	
EU-07 (Storage Silo)	3.67	1.26	0.00	0.00	0.00	0.00	0.0	0.0	
Granule Treatment	4.88	1.23	0.00	0.00	0.00	0.00	0.0	0.0	
EU-03, EU-08 (Natural Gas Units)	0.06	0.23	0.02	2.98	0.16	2.50	5.62E-02	5.36E-02	(Hexane)
Storage Tanks	0.00	0.00	0.00	0.00	0.03	0.00	0.00E+00	0.00E+00	
Fourteen (14) seasonally used space heaters	0.13	0.51	0.04	6.66	0.37	5.59	1.26E-01	1.20E-01	(Hexane)
Total	16.71	5.67	0.06	9.64	15.91	8.09	1.82E-01	1.73E-01	(Hexane)

Potential Emissions of VOC and PM/PM10

Asphalt Roofing Line EU-01

Company Name: Firestone Building Products Company

Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203

Registration No.: 097-30565-00140

Reviewer: Jack Harmon

Date: 2011

Emission Unit ID	Emission Unit Description	Stack ID	Control Device	Control	Max. throughput Asphalt Compound			Flow Rate		Temp.	AP-42	VOC Site Specific Emission Factor**	PTE VOC (before control)			Max. throughput Limestone Filler			PM Emission Factor*	PTE PM (before control)			PTE PM (after control)	
				Efficiency	lb/hr	ton/hr	ton/yr	acfm	scfm	oF	Em. Factor		lb/hr	lb/day	ton/yr	lb/hr	ton/hr	ton/yr		lb/hr	lb/day	ton/yr		ton/yr
				%							lb/ton		lb/ton											
EU-01	Line 1 (EU-01)	1	Mist Eliminator MME	57.0%	22,603	11.30	99,001	10,000	8,013	114	N/A	0.31	3.50	84.08	15.35	13,461	6.73	58,959	0.08	0.54	12.92	2.36	1.01	
													3.50	84.08	15.35					0.54	12.92	2.36	1.01	

PM10/2.5 Emission Factor*	PTE PM10/PM2.5 (before control)			PTE PM10/PM2.5 (after control)
	lb/hr	lb/day	ton/yr	
lb/ton				
0.0174	0.12	2.81	0.51	0.22
	0.12	2.81	0.51	0.22

Methodology

*Site specific emission factors for PM, PM10, and PM2.5 are from October, 2008 Stack Test.

** Emission Factor for VOC is from existing permit, 097-23189-00140, requested by source, which is more conservative than latest stack test data from 10/2008.

PTE before control (lb/hour) = Maximum throughput (tons/year) x emission factor (lbs/ton) x 1 year/8760 hours

PTE before control (tons/year) = PTE before control (lbs/hour) x 8760 hours x 1 ton/2000 lb:

PTE after control (tons/year) = PTE before control (tons/year) x 1 - control efficiency (%)

**Potential Emissions of PM and PM10
Storage Silos EU-02, EU-07**

Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Reistration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011

Emission Unit	Emission Unit Description	Stack ID	Control Device	Control Efficiency	Maximum Throughput		AP-42 Emission Factors		PM PTE (before control)		PM PTE (after control)	PM-10, 2.5 PTE (before control)		PM-10, 2.5 PTE (after control)
					lbs/hr	tons/year	PM (lbs/ton)	PM-10 (lbs/ton)	lbs/hr	tons/year	tons/year	lbs/hr	tons/year	tons/year
2	Calcium Carbonate Silo	2	Baghouse	99%	3,560	15,593	0.72	0.48	1.28	5.61	0.021	0.85	1.93	0.019
7	Sand Silo	7	Baghouse	99%	2,330	10,205	0.72	0.48	0.84	3.67	0.014	0.56	1.26	0.013
										9.29	0.04	1.41	3.19	0.03

Methodology

Emission factors are derived from AP-42, Table 11.12-2 (Cement/fly ash Storage Silos)

PTE before control (lb/hour) = Maximum throughput (tons/year) x emission factor (lbs/ton) x 1 year/8760 hours

PTE before control (tons/year) = PTE before control (lbs/hour) x 8760 hours x 1 ton/2000 lbs

PTE after control (tons/year) = PTE before control (tons/year) x 1 - control efficiency (%)

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Seasonally Used Space Heaters**

Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

15.2

133.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/	0.13	0.51	0.04	6.66	0.37	5.59

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 3;

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MM

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See following page for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011

		HAPs - Organics					TOTAL
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03		
Potential Emission in tons/yr	1.398E-04	7.989E-05	4.993E-03	#####	2.264E-04	1.253E-01	
		HAPs - Metals					TOTAL
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03		
Potential Emission in tons/yr	3.329E-05	7.323E-05	9.321E-05	#####	1.398E-04	3.648E-04	
						TOTAL	
						1.256E-01	
						Worst	
						1.198E-01	
						Hexane	

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 EU-03, EU-08**

Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011

Heat Input Capacity Potential Throughput
 MMBtu/hr MMCF/yr

<u>Unit</u>	<u>MMBtu/hr.</u>
EU-03	6.0
EU-08	0.8
Total	6.8

6.8

59.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.06	0.23	0.02	2.98	0.16	2.50

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-02 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011

HAPs - Organics						Total
Emission Factor in lb/MMc:	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	6.255E-05	3.574E-05	2.234E-03	5.361E-02	1.013E-04	5.604E-02

HAPs - Metals						Total
Emission Factor in lb/MMc:	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	1.489E-05	3.276E-05	4.170E-05	1.132E-05	6.255E-05	1.632E-04

Total 5.621E-02
 Worst 5.361E-02 Hexane

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1

**Appendix A: Emission Calculations
Granule Treatment System**

**Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon**

Emission Unit	Control Device	Control Efficiency	Maximum Throughput		*AP-42 Emission Factors		PM PTE (before control)		PM PTE (after control)	PM-10/2.5 PTE (before control)		PM-10 PTE (after control)
			lbs/hr	tons/year	PM (lbs/ton)	PM10 (lbs/ton)	PM (lbs/hr)	PM (tons/year)	tons/year	lbs/hr	tons/year	tons/year
Bulk bag to bucket elevator	CE-06	99%	4,000	17,520	0.0021	0.00099	0.00	0.018	0.0002	0.00	0.01	0.000
bucket elevator to elevated storage		99%	4,000	17,520	0.0021	0.00099	0.00	0.018	0.0002	0.00	0.01	0.000
Elevated Storage to blender		99%	4,000	17,520	0.544	0.134	1.09	4.77	0.0477	0.27	1.17	0.012
Mixer to elevated storage		99%	4,000	17,520	0.0021	0.00099	0.00	0.018	0.0002	0.00	0.01	0.000
Elevated storage to bucket Elevator		99%	4,000	17,520	0.0021	0.00099	0.00	0.018	0.0002	0.00	0.01	0.000
Drying		99%	4,000	17,520	0.0021	0.00099	0.00	0.018	0.0002	0.00	0.01	0.000
Tote Filling		99%	4,000	17,520	0.0021	0.00099	0.00	0.018	0.0002	0.00	0.01	0.000
Total							4.88	0.05		1.23	0.012	

There are no emissions in AP42 for PM2.5; therefore, PM10 = PM2.5

*According to the permittee the concrete batching emission factors represent this process, and the material consist of the similar type/size aggregates as a concrete batch plant. They are actually conservative numbers since the process is only dry at the unloading phase and is wet the remainder of the process. Since it is wet, the grain loading would not work.

Methodology:

Emission factors are derived from AP-42, Table 11.12-2 (concrete batch)

PTE before control (lb/hour) = Maximum throughput (tons/year) x emission factor (lbs/ton) x 1 year/8760 hours

PTE before control (tons/year) = PTE before control (lbs/hour) x 8760 hours x 1 ton/2000 lbs

PTE after control (tons/year) = PTE before control (tons/year) x (1 - control efficiency) (%)

**Appendix A: Emission Calculations
Liquid Storage Tanks**

**Company Name: Firestone Building Products Company
Address: 3525 S. Arlington Avenue, Indianapolis, IN 46203
Registration No.: 097-30565-00140
Reviewer: Jack Harmon
Date: 2011**

<u>Storage Tanks Description</u>	<u>Material Stored</u>	<u>Cu. Ft.</u>	<u>Gallons Capacity</u>
Tank MB1	Asphalt	3470	25957
Tank MB2	Asphalt	3470	25957
Tank MB3	Asphalt	3470	25957
Tank 4	Polypropylene	3370	25209

Tank I.D.	Material Stored	Construction Date	Capacity (area)	Capacity (gallons)	Type of Tank (e.g. vertical fixed roof)	Working Loss VOC (lb/yr)	Breathing Loss VOC (lbs/yr)	Actual VOC Emissions from Tank 4.0.9d (lb/yr.)	Actual VOC Emissions from Tank 4.0.9d (ton/yr.)
Tank MB1	Asphalt	1990	3470 cu ft	25,957	vertical fixed roof	23.41	0	23.41	0.012
Tank MB2	Asphalt	1990	3470 cu ft	25,957	vertical fixed roof	23.41	0	23.41	0.012
Tank MB3	Asphalt	1998	3470 cu ft	25,957	vertical fixed roof	23.41	0	23.41	0.012
TOTAL								70.23	0.035

Methodology:

Information on the three (3) asphalt storage tanks provided by source and were from Tanks 4.0.9d on June 22, 2011. Since there is no specific classification in Tanks 4.0.9d for asphalt storage, a conservative classification was used of Residual Oil #6. Tank 4 contains no VOCs and, therefore, has no VOC emissions, so no report was run for that tank. VOC Emissions in pounds per year was calculated using Tanks 4.0.9d. VOC Emissions in tons per year = VOC Emissions in pounds per year divided by 2000 lbs/ton.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Lance Black
Firestone Building Products Company
3525 S Arlington Ave
Indianapolis, IN 46203

DATE: June 30, 2011

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Registration - Transition from MSOP
097 - 30565 - 00140

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jeff Alford, Plant Mgr
Jim Euler DECA Environmental & Associates
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 6/30/2011 Firestone Bldg Products Co 097 - 30565 - 00140 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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											Remarks
1		Lance Black Firestone Bldg Products Co 3525 S Arlington Ave Indianapolis IN 46203 (Source CAATS) Via confirmed delivery									
2		Jeff Alford Plant Mgr Firestone Bldg Products Co 3525 S Arlington Ave Indianapolis IN 46203 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)									
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
7		Jim Euler DECA Environmental & Associates, Inc. 410 1st Ave. NE Carmel IN 46032 (Consultant)									
8		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)									
9		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
10											
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