Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Permit Evaluation
and
Statement of Basis
for
MAJOR FACILITY REVIEW PERMIT
Minor Revision

for

Owens Corning
Facility #A0041

Facility Address:
960 Central Expressway
Santa Clara, CA 95050

Mailing Address:
960 Central Expressway
Santa Clara, CA 95050

January 2006

Application 10469

Application Engineer: Krishnaswamy R. Bhagavan
Site Engineer: Krishnaswamy R. Bhagavan

TABLE OF CONTENTS

Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant.
This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A0041. The District issued Owens Corning their initial Title V permit on November 25, 2003.

Current Permit Action

The purpose of this action is to incorporate into Owens Corning's Title V permit the parametric monitoring ranges for the following abatement devices: A-7, A-26, A-40, A-44, A-48, A-70, A-99, A-100, A-101, A-102, A-149, and A-150. Specifically, prior to the issuance of Owens Corning's existing Title V permit, the company had requested the District additional time for installing parametric measurement devices (to measure pressure drop across A-7, A-26, A-40, A-44, A-48, A-70, A-99, A-100, A-101, A-102, A-149, and A-150, and the water flow rate across A-26) and for determining the proper operating ranges of the afore-referenced abatement devices.

B. NSR Permit Evaluation

The proposed action will not result in any emissions increase. Therefore, a NSR permit evaluation has not been attached.

C. Supplemental Information

Owens Corning submitted the following parametric monitoring ranges for abatement devices A-7, A-26, A-40, A-44, A-48, A-70, A-99, A-100, A-101, A-102, A-149, and A-150:

1. Pressure drop range (0.1" wc[1] to 3" wc) for the "M" line high efficiency air filtration (HEAF) system **A-7** abating S-4, the "M" line cooling section.
2. Pressure drop range (1" wc to 10" wc) for the "O" line Schmeig scrubber **A-26** abating S-22, the "O" line cooling section.
3. Water flow range (50 gpm[2] to 250 gpm) for the "O" line Schmeig scrubber **A-26** abating S-22, the "O" line cooling section.
4. Pressure drop range (8" wc to 21" wc) for the outdoor penclones **A-40** abating S-61 and S-62, consisting of the packing dust collection systems on the "M" and "O" lines.
5. Pressure drop range (2" wc to 6" wc) for the dust collector **A-44** abating S-56, the Batch Materials Silo & Unloading System.
6. Pressure drop range (0" wc to 10" wc) for baghouse **A-48** abating S-57, consisting of the batch mixing system, minor ingredient bag emptying station, and furnace charge hoppers.
7. Pressure drop range (1.5" wc to 5.5" wc) for the filter and mist eliminator **A-70** abating S-70, the "O" line asphalt applicatior.
8. Pressure drop range (1" wc to 20" wc) for the "O" line smoke stripper air action cyclone scrubber **A-99** abating S-21, the "O" line curing oven.
9. Pressure drop range (5" wc to 40" wc) for the "O" line smoke stripper HPAF **A-100** abating S-21, the "O" line curing oven.
10. Pressure drop range (1" wc to 20" wc) for the "M" line smoke stripper air action cyclone scrubber **A-101** abating S-3, the "M" line curing oven.
11. Pressure drop range (5" wc to 40" wc) for the "M" line smoke stripper high performance air filter (HPAF) **A-102** abating S-3, the "M" line curing oven.
12. Pressure drop range (0" wc to 10" wc) for baghouse **A-149** abating S-26, the sandblasting room.
13. Pressure drop range (1.5" wc to 4.5" wc) for the filter and mist eliminator **A-150** abating abating S-69, the "M" line asphalt applicatior.

Incorporation of parametric monitoring ranges into Owens Corning's Title V permit is a minor revision for the following reasons:

- The change is not considered a major modification under 40 CFR Parts 51 (NSR) or 52 (PSD).
- The change is not considered a modification under 40 CFR Parts 60 (NSPS), 61 (NESHAPS), or Section 112 of the Clean Air Act (HAP).
- There is no significant change or relaxation of monitoring.
- No term is established to allow the facility to avoid an applicable requirement.
- No case-by-case determination has been made.
- No facility-specific determination for ambient impacts, visibility analysis, or increment analysis on portable sources has been made.
- No new federal requirement has been imposed.

[1] wc - water column; 1 Pound per Square Inch (PSI) = 27.68" wc

[2] gpm – gallons per minute

The proposed changes to the permit are shown in "~~strikeout~~/underline" format. In this action, the District is soliciting public comment only on the revisions proposed in this action. When the permit is finalized, the tracking marks will be removed.

This statement of basis does not address the factual and legal basis for any other permit terms. These are addressed in the comprehensive statements of basis that were prepared for the initial issuance of the permit and subsequent reopenings and revisions. These are available on request.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities.

Changes in this action

No changes to this section are proposed in this action.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by a S and a number (e.g., S24).

Changes in this action

The following changes are proposed in this action:

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-5	"M" Charge Incinerator Firing Natural Gas; Maximum Firing Rate: 3.35 MM Btu/hr	S-3	40 CFR 63.1382 (a)(2)(i)	Firebox Temperature > 1,340 ^{o}F; Destruction Efficiency > 98 wt%	Formaldehyde Emissions for "M" RS Line < 1.2 lb/ton of glass pulled
A-6	"M" Discharge Incinerator Firing Natural Gas; Maximum Firing Rate: 3.35 MM Btu/hr	S-3	40 CFR 63.1382 (a)(2)(i)	Firebox Temperature > 1,340 ^{o}F; Destruction Efficiency > 98 wt%	Formaldehyde Emissions for "M" RS Line < 1.2 lb/ton of glass pulled
A-7	High Efficiency Air Filtration (HEAF) System – "M" Cooling	S-4	Regulation 6-301	~~Pressure Drop – To Be Determined (TBD)~~[3] Pressure Drop – 0.1" wc to 3" wc	Ringelmann 1 < 3 min/hr
A-7	High Efficiency Air Filtration (HEAF) System – "M" Cooling	S-4	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop – 0.1" wc to 3" wc	0.15 gr/dscf

[3] ~~Owens Corning has requested additional time for the installation of measurement devices on the abatement equipment. In addition, the company has requested additional time from the date of installation of the above devices to determine the proper monitoring ranges.~~

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-7	High Efficiency Air Filtration (HEAF) System – "M" Cooling	S-4	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop – 0.1" wc to 3" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-25	"O" Oven Incinerator Firing Natural Gas; Maximum Firing Rate: 6.0 MM Btu/hr	S-21	40 CFR 63.1382 (a)(2)(i)	Firebox Temperature > 1,340 ^{o}F; Destruction Efficiency > 98 wt%	Formaldehyde Emissions for "O" RS Line < 1.2 lb/ton of glass pulled
A-26	'O" Cooling Scrubber	S-22	Regulation 6-301	~~Pressure Drop & Water Flow Rate – TBD~~ Pressure Drop - 1" wc to 10" wc. ; Water Flow Rate – 50 gpm to 250 gpm	Ringelmann 1 < 3 min/hr
A-26	'O" Cooling Scrubber	S-22	Regulation 6-310	~~Pressure Drop & Water Flow Rate – TBD~~ Pressure Drop - 1" wc to 10" wc. ; Water Flow Rate – 50 gpm to 250 gpm	0.15 gr/dscf
A-26	'O" Cooling Scrubber	S-22	Regulation 6-311	~~Pressure Drop & Water Flow Rate – TBD~~ Pressure Drop - 1" wc to 10" wc. ; Water Flow Rate – 50 gpm to 250 gpm	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-34	Dust Collector - 'M' Bin	S-86	Regulation 6-301	Pressure Drop - Not Available[4]	Ringelmann 1 < 3 min/hr
A-34	Dust Collector - 'M' Bin	S-86	Regulation 6-310	Pressure Drop - Not Available	0.15 gr/dscf

[4] Due to the intermittent nature of operation of the dust collectors and the very wide and rapid fluctuations in their ΔP, Owens Corning indicated that it is not possible to determine a specific monitoring range to demonstrate on-going compliance.

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-34	Dust Collector - 'M' Bin	S-86	Regulation 6-311	Pressure Drop - Not Available	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-35	Dust Collector - 'O' Bin	S-87	Regulation 6-301	Pressure Drop - Not Available[5]	Ringelmann 1 < 3 min/hr
A-35	Dust Collector - 'O' Bin	S-87	Regulation 6-310	Pressure Drop - Not Available	0.15 gr/dscf
A-35	Dust Collector - 'O' Bin	S-87	Regulation 6-311	Pressure Drop - Not Available	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-38	Dust Collector - BB Bin	S-90	Regulation 6-301	Pressure Drop - Not Available[6]	Ringelmann 1 < 3 min/hr
A-38	Dust Collector - BB Bin	S-90	Regulation 6-310	Pressure Drop - Not Available	0.15 gr/dscf
A-38	Dust Collector - BB Bin	S-90	Regulation 6-311	Pressure Drop - Not Available	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-40	"M" & "O" Line Dust Collection Penclones	S-61 S-62	Regulation 6-301	~~Pressure Drop - TBD~~ Pressure Drop - 8" wc to 21" wc	Ringelmann 1 < 3 min/hr
A-40	"M" & "O" Line Dust Collection Penclones	S-61 S-62	Regulation 6-310	~~Pressure Drop - TBD~~ Pressure Drop - 8" wc to 21" wc	0.15 gr/dscf
A-40	"M" & "O" Line Dust Collection Penclones	S-61 S-62	Regulation 6-311	~~Pressure Drop - TBD~~ Pressure Drop - 8" wc to 21" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-44	Dust Collection Baghouse	S-56	Regulation 6-301	~~Pressure Drop - TBD~~ Pressure Drop - 2" wc to 6" wc	Ringelmann 1 < 3 min/hr

[5] Due to the intermittent nature of operation of the dust collectors and the very wide and rapid fluctuations in their ΔP, Owens Corning indicated that it is not possible to determine a specific monitoring range to demonstrate on-going compliance.

[6] Due to the intermittent nature of operation of the dust collectors and the very wide and rapid fluctuations in their ΔP, Owens Corning indicated that it is not possible to determine a specific monitoring range to demonstrate on-going compliance.

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-44	Dust Collection Baghouse	S-56	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 2" wc to 6" wc	0.15 gr/dscf
A-44	Dust Collection Baghouse	S-56	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 2" wc to 6" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-48	Pulse Jet Baghouse	S-57	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 0" wc to 10" wc	Ringelmann 1 < 3 min/hr
A-48	Pulse Jet Baghouse	S-57	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 0" wc to 10" wc	0.15 gr/dscf
A-48	Pulse Jet Baghouse	S-57	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 0" wc to 10" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-70	Fiberbed Filter	S-70	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 1.5" wc to 5.5" wc	Ringelmann 1 < 3 min/hr
A-70	Fiberbed Filter	S-70	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 1.5" wc to 5.5" wc	0.15 gr/dscf
A-70	Fiberbed Filter	S-70	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 1.5" wc to 5.5" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-99	Air Action Cyclone Scrubber	S-21	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 1" wc to 20" wc	Ringelmann 1 < 3 min/hr
A-99	Air Action Cyclone Scrubber	S-21	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 1" wc to 20" wc	0.15 gr/dscf
A-99	Air Action Cyclone Scrubber	S-21	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 1" wc to 20" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-100	High Performance Air Filter; OCF Design, Fabric Filter	S-21 (A-99)	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 5" wc to 40" wc	Ringelmann 1 < 3 min/hr

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-100	High Performance Air Filter; OCF Design, Fabric Filter	S-21 (A-99)	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 5" wc to 40" wc	0.15 gr/dscf
A-100	High Performance Air Filter; OCF Design, Fabric Filter	S-21 (A-99)	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 5" wc to 40" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-101	Air Action Cyclone Scrubber	S-3	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 1" wc to 20" wc	Ringelmann 1 < 3 min/hr
A-101	Air Action Cyclone Scrubber	S-3	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 1" wc to 20" wc	0.15 gr/dscf
A-101	Air Action Cyclone Scrubber	S-3	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 1" wc to 20" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-102	High Performance Air Filter	S-3 (A-101)	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 5" wc to 40" wc	Ringelmann 1 < 3 min/hr
A-102	High Performance Air Filter	S-3 (A-101)	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 5" wc to 40" wc	0.15 gr/dscf
A-102	High Performance Air Filter	S-3 (A-101)	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 5" wc to 40" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-149	Sandblasting Baghouse	S-26	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 0" wc to 10" wc	Ringelmann 1 < 3 min/hr
A-149	Sandblasting Baghouse	S-26	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 0" wc to 10" wc	0.15 gr/dscf
A-149	Sandblasting Baghouse	S-26	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 0" wc to 10" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr
A-150	Fiberbed Filter	S-69	Regulation 6-301	~~Pressure Drop – TBD~~ Pressure Drop - 1.5" wc to 4.5" wc	Ringelmann 1 < 3 min/hr

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-150	Fiberbed Filter	S-69	Regulation 6-310	~~Pressure Drop – TBD~~ Pressure Drop - 1.5" wc to 4.5" wc	0.15 gr/dscf
A-150	Fiberbed Filter	S-69	Regulation 6-311	~~Pressure Drop – TBD~~ Pressure Drop - 1.5" wc to 4.5" wc	$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit

Changes in this action

No changes to this section are proposed in this action.

IV. Source-Specific Applicable Requirements

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit.

Complex Applicability Determinations

The proposed action does not warrant any complex applicability determinations.

Other changes in this action

No changes to this section are proposed in this action.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 that provides that a major facility review permit shall contain the following information and provisions:

"409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the

> plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted."

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

VI. Permit Conditions

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This term is used for a condition imposed by the APCO which limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- TRMP: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

All changes to existing permit conditions are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all 'strike-out" language will be deleted and all "underline" language will be retained, subject to consideration of comments received.

Additional monitoring has been added, where appropriate, to assure compliance with the applicable requirements.

Changes in this action

The text in the following permit conditions as it relates to the installation of parametric monitors, the establishment of a parametric monitoring range, and the submission of the appropriate monitoring ranges for inclusion in Owens Corning's Title V permit will be modified accordingly:

Part 3 of permit condition 12144 (that governs the operation of S-57); and
Part 7 of permit condition 15250 (that governs the operation of S-26); and
Parts 3 and 4 of permit condition 20565 (that governs the operation of S-3 and S-21); and
Parts 2 and 3 of permit condition 20566 (that governs the operation of S-4 and S-22).

Condition # 12144

3. The owner/operator shall ensure that the pressure drop measured by a District-approved manometer or other District-approved device that measures the pressure drop across A-48 ranges between 0" wc to 10" wc, and assures compliance of emissions from S-57 with parts 2 and 4 of this condition. ~~Within 5 months from the date of the final issuance of the Major Facility Review permit, the owner/operator shall install a District-approved manometer or other District-approved device that measures the pressure drop across A-48. Within 3 months following the date of installation of the District approved measurement devices, the owner/operator shall determine the proper operating range for the above abatement device that assures compliance of emissions from S-57 with parts 2 and 4 of this condition. This range shall be submitted to the Permits Division of the District for inclusion in the permit as a minor permit revision.~~ The owner/operator shall inspect and record the condition of the bags for plugging and/or leaks and/or defects once every 6 months. The owner/operator shall record the type of defect detected, the date and time when the defect was detected, and the date and time when the defect was rectified in a repair log. The owner/operator shall maintain records of the semiannual baghouse inspection logs and baghouse repair logs on-site for five years from the date of last entry and shall make them available for inspection by District staff upon request
(Basis: Regulation 2-6-409.2, Regulation 2-6-503)

Condition # 15250

7. The owner/operator shall maintain and keep baghouse A-149 in a good operating condition at all times that assures compliance with Regulation 6 standards. The owner/operator shall ensure that the pressure drop measured by a District-approved manometer or other District-approved device that measures the pressure drop across A-149 ranges between 0" wc to 10" wc. ~~Within 5 months from the date of the final issuance of the Major Facility Review permit, the owner/operator shall install a District-approved manometer or other District-approved device that measures the pressure drop across A-149. Within 3 months following the date of installation of the District approved measurement devices, the owner/operator shall determine the proper operating range for the above abatement device. This range shall be submitted to the Permits Division of the District for inclusion in the permit as a minor permit revision.~~ The owner/operator shall inspect and record the condition of the bags for plugging and/or leaks and/or defects once per year. The owner/operator shall record the type of defect detected, the date and time when the defect was detected, and the date and time when the defect was rectified in a repair log. The owner/operator shall maintain records of the yearly baghouse inspection logs and baghouse repair logs on-site for five years from the date of last entry and shall make them available for inspection by District staff upon request
(Basis: Regulation 2-6-409.2, Regulation 2-6-503, Cumulative Increase)

Condition # 20565

3. The owner/operator shall ensure that the pressure drop measured by a a District-approved manometer or other District-approved device that measures the pressure drop across A-99 ranges between 1" wc to 20" wc, A-100 ranges between 5" wc to 40" wc, A-101 ranges between 1" wc to 20" wc, and A-102 ranges between 5" wc to 40" wc.~~Within 5 months~~

~~from the date of the final issuance of the Major Facility Review permit, the owner/operator shall install a District-approved manometer or other District-approved device that measures the pressure drop across A-99, A-100, A-101 and A-102. Within 3 months following the date of installation of the District approved measurement devices, the owner/operator shall determine the proper operating range for the above abatement devices. This range shall be submitted to the Permits Division of the District for inclusion in the permit as a minor permit revision.~~
(Basis: Regulation 2-6-503)

4. The ~~After the monitor is installed and the pressure drop range is determined in accordance with part 3 of this condition, the~~ owner/operator shall monitor and record the pressure drop across A-99, A-100, A-101 and A-102 once per shift. (Basis: Regulation 2-6-503)

Condition # 20566

2. The owner/operator shall ensure that the pressure drop measured by a a District-approved manometer or other District-approved device that measures the pressure drop across A-7 ranges between 0.1" wc to 3" wc, and A-26 ranges between 1" wc to 10" wc. In addition, the owner/operator shall ensure that the water flow rate measured by a District-approved water flow meter or other District-approved device to measure the water flow rate across A-26 ranges between 50 gpm to 250 gpm. ~~Within 5 months from the date of the final issuance of the Major Facility Review permit, the owner/operator shall install a District-approved manometer or other District-approved device that measures the pressure drop across A-7 and A-26. In addition, the owner/operator shall install a District-approved water flow meter or other District-approved device to measure the water flow rate across A-26. Within 3 months following the date of installation of the District approved measurement devices, the owner/operator shall determine the proper operating range for the above abatement devices. This range shall be submitted to the Permits Division of the District for inclusion in the permit as a minor permit revision.~~
(Basis: Regulation 2-6-503)

3. The ~~After the pressure drop monitor and the water flow meter are installed and the pressure drop range and water flow rate are determined in accordance with part 2 of this condition, the~~ owner/operator shall monitor and record the pressure drop across A-7 and A-26 once per day. The owner/operator shall monitor and record the water flow rate through A-26 once per day. (Basis: Regulation 2-6-503)

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The District has reviewed all monitoring and has determined the existing monitoring is adequate with the following exceptions.

Changes in this action
The "Monitoring Frequency" columns contained in Table VII-C (relating to S-3 and S-21), Table VII-D (relating to S-4 and S-22), Table VII-E (relating to S-26), and Table VII-H (relating to S-57), will be modified as follows:

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-3 – "M" CURING OVEN
S-21 – "O" CURING OVEN

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD Regulation 6-301	Y		Ringelmann 1.0 For less than 3 minutes in an hour	BAAQMD Permit Condition 20565, Part 5	P/D	Visual Observation Recordkeeping
Opacity	BAAQMD Permit Condition 20565, Part 5	Y		Ringelmann 1.0 For less than 3 minutes in an hour	BAAQMD Permit Condition 20565, Part 5	P/D	Visual Observation Recordkeeping
Glass Production	BAAQMD Permit Condition 20565, Part 13	Y		6 tons/hour 144 tons/day	BAAQMD Permit Condition 20565, Part 14	P/D	Recordkeeping
FP	BAAQMD Regulation 6-310	Y		0.15 grains per dscf of exhaust gas volume	BAAQMD Permit Condition 20565, Part 6	P Once Per Permit Term	Source Test
FP	BAAQMD Regulation 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	BAAQMD Permit Condition 20565, Part 6	P Once Per Permit Term	Source Test
FP	BAAQMD Permit Condition 20565, Part 3	Y		Pressure drop range across A-99: 1" wc to 20" wc	BAAQMD Permit Condition 20565, Part 4	P/E Once per shift	Recordkeeping

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-3 – "M" CURING OVEN
S-21 – "O" CURING OVEN

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
FP	BAAQMD Permit Condition 20565, Part 3	Y		Pressure drop range across A-100: 5" wc to 40" wc	BAAQMD Permit Condition 20565, Part 4	P/E Once per shift	Recordkeeping
FP	BAAQMD Permit Condition 20565, Part 3	Y		Pressure drop range across A-101: 1" wc to 20" wc	BAAQMD Permit Condition 20565, Part 4	P/E Once per shift	Recordkeeping
FP	BAAQMD Permit Condition 20565, Part 3	Y		Pressure drop range across A-102: 5" wc to 40" wc	BAAQMD Permit Condition 20565, Part 4	P/E Once per shift	Recordkeeping
SO_2	BAAQMD Regulation 9-1-301	Y		Ground Level Concentration of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	None	N	None
SO_2	BAAQMD Regulation 9-1-302	Y		300 ppm (dry)	None	N	None
Incinerator Firebox Temperature	40 CFR 63.1382 (b)(6)	Y		Average firebox temperature at A-5, A-6 and A-25 for any 3-hour block period ≥ 1340 ºF	40 CFR 63.1383 (g)(1)	C	Recordkeeping – Firebox Operating Temperature
Incinerator Firebox	BAAQMD Permit Condition 20565, Part 5	Y		Proper Incinerator Maintenance	40 CFR 63.1383 (g)(2)	P/A	Inspection – Incinerator

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-3 – "M" CURING OVEN
S-21 – "O" CURING OVEN

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Formaldehyde	40 CFR 63.1382 (a)(2)(i)	Y		1.2 lb/ton of glass pulled – Per Rotary Spin Manufacturing Line	BAAQMD Permit Condition 20565, Part 9	P Once Per Permit Term	Source Test

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S-4 – "M" COOLING
S-22 – "O" COOLING

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD Regulation 6-301	Y		Ringelmann 1.0 For less than 3 minutes in an hour	BAAQMD Permit Condition 20566, Parts 4	P/D	Visual Observation Recordkeeping
Opacity	BAAQMD Permit Condition 20566, Part 4	Y		Ringelmann 1.0 For less than 3 minutes in an hour	BAAQMD Permit Condition 20566, Parts 4	P/D	Visual Observation Recordkeeping
Glass Production	BAAQMD Permit Condition 20566, Part 7	Y		6 tons/hour 144 tons/day	BAAQMD Permit Condition 20566, Part 8	P/D	Recordkeeping
FP	BAAQMD Regulation 6-310	Y		0.15 grains per dscf of exhaust gas volume	BAAQMD Permit Condition 20566, Part 5	P Once Per Permit Term	Source Test

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S-4 – "M" COOLING
S-22 – "O" COOLING

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
FP	BAAQMD Regulation 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	BAAQMD Permit Condition 20566, Part 5	P Once Per Permit Term	Source Test
FP	BAAQMD Permit Condition 20566, Part 2	Y		Pressure drop range across A-7: 0.1" wc to 3" wc	BAAQMD Permit Condition 20566, Part 3	P/D	Recordkeeping
FP	BAAQMD Permit Condition 20566, Part 2	Y		Pressure drop range across A-26: 1" wc to 10" wc	BAAQMD Permit Condition 20566, Part 3	P/D	Recordkeeping
FP	BAAQMD Permit Condition 20566, Part 2	Y		Water flow rate across A-26: 50 gpm to 250 gpm	BAAQMD Permit Condition 20566, Part 3	P/D	Recordkeeping
SO_2	BAAQMD Regulation 9-1-301	Y		Ground Level Concentration of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	None	N	None
SO_2	BAAQMD Regulation 9-1-302	Y		300 ppm (dry)	None	N	None
Formaldehyde	40 CFR 63.1382 (a)(2)(i)	Y		1.2 lb/ton of glass pulled – Per Rotary Spin Manufacturing Line	40 CFR 63.1383 (l)	P/D	Recordkeeping – Finished Product LOI and Density
Formaldehyde	40 CFR 63.1382 (a)(2)(i)	Y		1.2 lb/ton of glass pulled – Per Rotary Spin Manufacturing Line	BAAQMD Permit Condition 20566, Part 6	P Once Per Permit Term	Source Test

Table VII - E
Applicable Limits and Compliance Monitoring Requirements
S-26 – SANDBLASTING ROOM

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD Regulation 6-301	Y		Ringelmann 1.0 For less than 3 minutes in an hour	BAAQMD Permit Condition 15250, Part 6	P/M	Visual Observation Recordkeeping
Opacity	BAAQMD Permit Condition 15250, Part 6	Y		Ringelmann 1.0 For less than 3 minutes in an hour	BAAQMD Permit Condition 15250, Part 6	P/M	Visual Observation Recordkeeping
FP	BAAQMD Regulation 6-310	Y		0.15 grains per dscf of exhaust gas volume	None	N	None
FP <u>FP</u>	BAAQMD Regulation 6-311 <u>BAAQMD Permit Condition 15250, Part 7</u>	Y <u>Y</u>		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr <u>Pressure drop range across A-149: 0" wc to 10" wc</u>	None <u>BAAQMD Permit Condition 15250, Part 6</u>	N <u>P/M</u>	None <u>Recordkeeping</u>

Table VII - H
Applicable Limits and Compliance Monitoring Requirements
S-57 – BATCH MIXING

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD Regulation 6-301	Y		Ringelmann 1.0 For less than 3 minutes in an hour	None	P/W	Visual Observation
Opacity	BAAQMD Permit Condition 12144, Part 2	Y		Ringelmann 0.5 For less than 3 minutes in an hour	BAAQMD Permit Condition 12144, Part 3	P/W	Visual Observation Recordkeeping

Table VII - H
Applicable Limits and Compliance Monitoring Requirements
S-57 – BATCH MIXING

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
FP	BAAQMD Regulation 6-310	Y		0.15 grains per dscf of exhaust gas volume	None	N	None
FP	BAAQMD Permit Condition 12144, Part 4	Y		0.015 grains per dscf of exhaust gas volume	None	N	None
FP	BAAQMD Regulation 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	None	N	None
FP	BAAQMD Permit Condition 12144, Part 3	Y		Pressure drop range across A-48: 0" wc to 10" wc	BAAQMD Permit Condition 12144, Part 2	P/W	Recordkeeping

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

Changes in this action
No changes to the test method section are proposed.

IX. Permit Shield:

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because

other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

Changes in this action
No changes to permit shields are proposed in this revision.

X. Revision History

This section contains the details of issuance and revisions for each permit.

Initial Title V permit issued November 25, 2003 under application 25819.

XI. Glossary

This section contains terms that may be unfamiliar to the general public or EPA.

Changes in this action
No changes to the glossary are proposed in this revision.

D. Alternate Operating Scenarios

No alternate operating scenario has been requested for this facility.

Changes in this action
No changes are proposed for this section.