

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
Company Name	Johns Manville Plant #8
Premise Number	03-20-01-0005
What makes this facility a Title V facility?	NOx, CO, and VOC, HAP, PE
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	Emissions unit P093, P094 & P095 PTI 03-17015. HEAF control and associated operational restriction, monitoring, record keeping and reporting requirements being removed from these emissions units. These emissions units were previously permitted at Johns Manville Plant 2 (03-20-01-0003) emissions units P017, P018 & P019 but the facility is being permitted under one premise number & this is the first step in that process. This significant modification is being issued without the additional minor modification because of time constraints.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
P001, P008, P013, P015	10.0 lbs PE/hr*	17- 11(B)(1)	N	Y	N	N	N	N	N	N	N	N	N	N	ND- *The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour (the permittee has demonstrated this based on stack testing). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table 1 of OAC rule 3745-17-11 the allowable PE limitation is greater than 10 lbs PE/hr. However, to ensure that Figure II will not be applicable, the permittee has agreed to accept the PE limitation stated above (less than 10 lbs/hr). CAM is not currently applicable

P005	5.85 lbs PE/hr	17- 11(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-maintain bag house pressure drop CAM is not currently applicable
P012	8.10 lbs PE/hr	n	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis- OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-08472.
P029  P043, P044	1.90 lbs PE/hr  2.78 lbs PE/hr	17- 11(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-must advance HEAF filter @15 minute intervals while emissions unit is operating. Appropriate monitoring, record keeping, and reporting requirements have been specified.  CAM is not currently applicable.
P047, P048, P049, P050, P051, P052, P054, P055	66.8 tons PE per rolling 365-day period	n	y	n	n	y	n	n	y	n	y	n	y		Basis-OAC rule 3745-31-05(D) All terms and conditions have been transferred from the PTI
P047  P054, P055	1.0 lbs PE/hr, 4.38 tpy PE  0.1 lbs PE/hr, 0.44 tpy PE	n	y	n	y	y	n	n	y	n	y	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from the PTI 03- 10931.  OR-maintain pressure drop across the bag house. Appropriate monitoring, record keeping, and reporting requirements have been specified.

P047	0.5 lb particulate matter/ton of glass pulled		y	n	y	y	n	n	y	n	y	n	y	y	<p>Basis-40 CFR Part 63, Subpart NNN All terms and conditions have been transferred from PTI 03-10931</p> <p>OR- continuously operate bag leak detection system, initiate corrective action within 1 hour of exceeding established average glass pull rate, implement QIP consistent with CAM when glass pull rate is exceeded by 20%, operate furnace so glass pull rate is not exceeded by 20% of average glass pull rate. Appropriate monitoring, record keeping, and reporting requirements have been specified.</p> <p>Misc-permittee must implement a Quality Improvement Plant (QIP) consistent with the CAM provisions of 40 CFR part 64, Subpart D when the bag leak detection system alarm is sounded for more than 5% of the total operating time in a 6-month block reporting period.</p>
P012 P013 P047, P048, P049, P050, P051, P052, P054, P055	none	17-11(B)	n	y	n	n	n	n	n	n	n	n	n	n	<p>ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>M,R,Rp,ET - no emission limitation established</p> <p>CAM is currently not applicable</p>
P048  P049  P050	9.99 lbs PE/hr, 42.96 tpy PE  9.02 lbs PE/hr, 38.79 tpy  7.76 lbs PE/hr, 33.37 tpy	n	y	n	y	y	n	n	y	n	y	n	y	n	<p>Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-10931.</p> <p>OR- maintain scrubber pressure drop and water flow rate. Hours of operation are restricted to 8600 hours. Appropriate monitoring, record keeping, and reporting requirements have been specified.</p>

P048, P049, P050	1.93 lbs Nox/hr, 8.30 tpy  1.66 lbs OC/hr, 7.14 tpy  0.80 lb formaldeh yde/hr, 3.44 tpy  1.0 lbs SO2/hr, 4.3 tpy	n	y	n	y	y	n	n	y	n	y	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-10931.  OR- Hours of operation are restricted to 8600 hours. Appropriate monitoring, record keeping, and reporting requirements have been specified.
P048, P049, P050, P052	1.2 lbs formaldeh yde/ton of glass pulled	n	y	n	y	y	n	n	y	n	y	n	y	y	Basis-40 CFR Part 63, Subpart NNN  OR-permittee must use a binder formulation that does not vary from the specification and operating range established and used during the performance test, the permittee must use a resin in the formulation of binder such that the free-formaldehyde content of the resin used does not exceed the free-formaldehyde range contained in the specification for the resin used during the performance test and the permittee must operate the scrubber such that the monitored parameter is not outside the limits established during the performance test for more than 10% of the total operating time in a 6-month block reporting period. Appropriate monitoring, record keeping, and reporting requirements have been specified.  Misc-permittee must implement a Quality Improvement Plant (QIP) consistent with the CAM provisions of 40 CFR part 64, Subpart D when any scrubber parameter is outside the limit(s) established during the performance test for more than 5% of the total operating time in a 6-month block reporting period.

P048, P049, P050, P052	11.0 lbs PE/ton of glass pulled	n	y	n	y	y	n	n	y	n	y	n	y	y	Basis-40 CFR Part 63, Subpart PPP  OR- maintain scrubber water flow rate and pressure drop  Appropriate monitoring, record keeping, and reporting requirements have been specified.
P047	0% opacity	n	y	n	n	n	n	n	n	n	n	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-10931 M,R,Rp - ET adequate to show compliance with VE limitation. VE are also minimized by scrubber control system  CAM is currently not applicable
P008, P015, P029, P043, P044, P093, P094, P095 Z009, Z010,	20% opacity as a 6- minute average	17-07(A)	n	n	n	y	n	n	y	n	y	n	y	n	M, R, Rp- Daily and/or weekly VE checks are being required to ensure compliance with the opacity limit.  CAM is currently not applicable
P005 P048, P049, P050, P051, P052	20% opacity as a 6- minute average	17-07(A)	n	n	n	n	n	n	n	n	n	n	y	n	M,R,Rp - ET adequate to show compliance with VE limitation. VE are also minimized by scrubber control system  CAM is currently not applicable
P008, P048, P049, P050, P052, Z009, Z010, Z028	none	21- 07(G)	n	n	y	y	n	n	y	n	y	n	n	n	OR-the use of photochemically reactive material in this emissions unit is prohibited.

P051	10.54 lbs NOx/hr, 45.32 tpy  1.63 lbs PE/hr, 7.01 tpy  2.01 lb CO/hr, 8.64 tpy  0.5 lbs SO2/hr, 2.15 tpy  1.21 lbs Oc/hr, 5.20 tpy  0.50 lb formaldehyde, 2.15 tpy	n	y	n	y	y	n	n	y	n	y	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-10931.  OR- Hours of operation are restricted to 8600 hours. Appropriate monitoring, record keeping, and reporting requirements have been specified.
P051	1.2 lbs formaldehyde/ton of glass pulled	n	y	n	y	y	n	n	y	n	y	n	y	n	Basis-40 CFR Part 63, Subpart NNN  OR-permittee must use a binder formulation that does not vary from the specification and operating range established and used during the performance test, the permittee must use a resin in the formulation of binder such that the free-formaldehyde content of the resin used does not exceed the free-formaldehyde range contained in the specification for the resin used during the performance test and the permittee must operate the incinerator such that any 3-hour block average temperature in the firebox does not fall below the average established during the performance test. Appropriate monitoring, record keeping, and reporting requirements have been specified.
P029 P051	none	21-07(G)	n	n	y	y	n	n	y	n	y	n	n	n	OR-VOC content of each material employed shall consist of only water and liquid organic material; liquid organic material shall comprise no more than 20% of the volatile content, and volatile content of each material shall not be a PRM.

P029, P051, P093, P094, P095	none	18-06(E)	n	y	n	n	n	n	n	n	n	n	n	n	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  M,R,Rp,ET - no emission limitation established  CAM is currently not applicable
P043 P044	none	18-06(E)	n	n	n	n	n	n	n	n	n	n	n	n	M,R,Rp,ET - no emission limitation established because process weight rate is less than 1,000 pounds/hour
P029 P051	employ BACT & LACT	21-08(B) and 23- 06(B)	n	n	y	y	n	n	y	n	y	n	n	n	OR-monitoring of thermal incinerator temperature
P093, P094, P095	employ BACT & LACT	21-08(B) and 23- 06(B)	n	n	n	n	n	n	n	n	n	n	n	n	M, R, Rp,- The BAT limits for NOx and CO are based on the EU's potential to emit, therefore no m, r, or rp is necessary.
P052	1.53 lbs PE/hr, 6.58 tpy  0.66 lbs Oc/hr, 2.84 tpy  0.35 lb formaldeh yde, 1.51 tpy	n	y	n	y	y	n	n	y	n	y	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-10931.  OR- Hours of operation are restricted to 8600 hours. Appropriate monitoring, record keeping, and reporting requirements have been specified.

P029	8.32 tpy PE	n	y	n	n	n	n	n	n	n	n	n	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-06749.  M,R,Rp - emission limitations represent the potential to emit, therefore ET is sufficient to show compliance.
	0.43 lbs Nox/hr, 1.88 tpy															
	3.50 lbs OC/hr, 15.33 tpy															
	2.47 lbs CO/hr, 10.8 tpy															
	0.60 lb formaldeh yde/hr, 2.63 tpy															
	1.3 lbs SO2/hr, 5.69 tpy															
	0.54 lb phenol/hr, 2.37 tpy															

P093	1.78 lbs PM <sub>10</sub> /hr, 7.80 tpy PM <sub>10</sub>  4.37 lbs CO/hr, 19.14 tpy CO  2.88 lbs OC/hr, 12.61 tpy OC  3.66 lbs NO <sub>x</sub> /hr, 16.03 tpy NO <sub>x</sub>  0.09 lb SO <sub>2</sub> /hr, 0.39 tpy SO <sub>2</sub>  0.82 lb formaldehy de/hr, 3.59 tpy formaldehy de	n	y	n	n	n	n	n	n	n	n	n	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-17,015.  M,R,Rp - emission limitations represent the potential to emit, therefore ET is sufficient to show compliance.
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P094, P095	0.76 lbs PM <sub>10</sub> /hr, 3.33 tpy PM <sub>10</sub>  1.86 lbs CO/hr, 8.15 tpy CO  1.23 lbs OC/hr, 5.39 tpy OC  1.56 lbs NO <sub>x</sub> /hr, 6.83 tpy NO <sub>x</sub>  0.04 lb SO <sub>2</sub> /hr, 0.18 tpy SO <sub>2</sub>  0.35 lb formaldehy de/hr, 1.53 tpy formaldehy de	n	y	n	n	n	n	n	n	n	n	n	y	n	Basis-OAC rule 3745-31-05(A)(3) All terms and conditions have been transferred from PTI 03-17,015.  M,R,Rp - emission limitations represent the potential to emit, therefore ET is sufficient to show compliance.
P093, P094, P095	1.2 lbs formaldehy de/ton of glass pulled	n	y	y	n	n	n	n	n	n	n	n	n	n	Basis - 40 CFR Part 63, Subpart NNN ND-Rule does not apply because the definition of reconstruction is not meet for the flame attenuation line.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C **Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.