

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Johns Manville Plant #8		
Premise Number	0320010005		
Number of Non-insignificant Emissions Units	24		
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 3745-77-01 (U)?	Yes		

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

- **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.

- If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P001, P008, P013	10.0 lbs PE/hr*	17-11 (B)(1)		N	Y	Y	Y	Y	N	*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 I 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).
P005	5.85 lbs PE/hr	17-11 (B)(1)		N	Y	Y	Y	Y	N	
P012	8.10 lbs PE/hr		Y	N	Y	Y	Y	Y	N	Other - The particulate emission limitation for this unit was established in PTI #03-8472 as a special condition to avoid PSD review from the increased emissions resulting from the installation of a new fiberglass forming line.
P015	9.08 lbs PE/hr	17-11 (B)(1)		N	Y	Y	Y	Y	N	
P029	1.89 lbs PE/hr	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR -Must advance HEAF filter @ 15 minute intervals while emission unit is operating.
P043, P044	2.79 lbs PE/hr	17-11 (B)(1)		Y	Y	Y	Y	N	N	OR - Must advance HEAF filter @ 15 minute intervals while emission unit is operating. ET - Compliance determined by AP42 emission factors
P047	0.46 lbs PE/hr, 1.98 TPY PE		Y	Y	Y	Y	Y	Y	N	Other - This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Maintain pressure drop across the baghouse of 2 - 5 inches. Hours of operation are restricted to 8600 hours.
P048	2.85 lbs PE/hr, 12.26 TPY PE		Y	Y	Y	Y	Y	Y	N	Other - This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Maintain pressure drop and scrubber water flow rates. Hours of operation are restricted to 8600 hours.
P049, P050	2.65 lbs PE/hr, 11.40 TPY		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Maintain pressure drop and scrubber water flow rates. Restrictions on hours of operation.
P051	0.19 lbs PE/hr		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Maintain pressure drop and scrubber water flow rates. Restrictions on hours of operation.

P052	0.57 lbs PE/hr		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Permittee must maintain pressure drop and scrubber water flow rates. Hours of operation are restricted to 8600 hours.
P054, P055	0.10 lbs PE/hr		Y	Y	N	Y	Y	N	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Permittee is restricted to 2000 hours of operation per rolling 12 month period. M - Meeting PE limit is ensured by restricting hours of operation which is verified by record keeping. ET - Compliance is determined by emission factors and hours of operations.
Z009, Z010	3.23 lbs PE/hr	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - Must advance HEAF filter @ 15 minute intervals while emission unit is operating.
Z904, Z908	0.020 lb PE/MM BTU	17-11 (B)(5)(b)		Y	Y	Y	Y	N	N	OR - Fuel restricted to the use of natural gas with a rating of 950 Btu/SCF. ET - Compliance verification is determined using AP42 emission factors.
P001, P005, P008, P012, P013, P015	20% opacity as a 6 minute average	17-07 (A)		N	Y	Y	Y	N	N	ET - Compliance is determined by daily VE observations, record keeping and deviation reporting
P029, P043, P044, P047, P048, P049, P050, P051, P052, Z009, Z010, Z011, Z904, Z908, Z911	20% opacity as a 6 minute average			N	N	N	N	Y	N	M,R,Rp - Use of control equipment used for maintaining compliance with PE limits or VOC limits, replaces the need for specific requirements for opacity monitoring, record keeping or reporting.

P008, P029, P048, P049, P050, P051, Z009, Z010, Z011, Z028	us of non photochemically reactive materials	21-07 (G)		Y	N	N	N	N	N	OR - Permittee is restricted to using binders which contain only non-photochemically reactive organic materials M, R, Rp, ET - The VOCs from this emission unit are excluded from the restrictions in 21-07 (G) because they meet the exclusion requirements described in 21-07 (G)(9)(c).
P048, P049, P050,	1.93 lbs NOx/hr, 8.30 TPY NOx		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Permittee is restricted to 8600 hours of operation. Must maintain a pressure drop on scrubber and minimum water flow rates.
P051	10.54 lbs NOx/hr, 45.32 TPY		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Permittee is restricted to 8600 hours of operation. Must maintain a pressure drop on scrubber and minimum water flow rates.
P048, P049, P050,	9.10 lbs CO/hr, 39.10 TPY CO		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Permittee is restricted to 8600 hours of operation. Must maintain a pressure drop on scrubber and minimum water flow rates
P051	2.10 lbs CO/hr, 8.64 TPY CO		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Permittee is restricted to 8600 hours of operation. Must maintain a pressure drop on scrubber and minimum water flow rates
P048, P049, P050, P051, P052	11.0 lbs PE/ton glass pulled	40 CFR Subpart PPP		Y	Y	Y	Y	Y	N	M, R, Rp - These requirements are met using the controls for standard PE limitations OR - Must maintain a pressure drop on scrubber and minimum water flow rates
P048, P049, P050, P052	1.66 lbs VOC/hr, 7.14 TPY VOC		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Hours of operation are restricted to 8600 hours. The permittee may only use binders that contain non-photochemically reactive organic compounds.
P051	0.21 lbs VOC hr, 0.90 TPY VOC		Y	Y	Y	Y	Y	Y	N	This limit was set in PTI #03-0931 to avoid PSD review during the installation of a new fiberglass forming line. OR - Hours of operation are restricted to 8600 hours. The permittee may only use binders that contain non-photochemically reactive organic compounds.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

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

Misc = miscellaneous requirements

- **Instructions for Part III:**

- 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.
- 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. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

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. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.