



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: ELK CORPORATION OF ALABAMA

FACILITY NAME: ELK CORPORATION OF ALABAMA

FACILITY/PERMIT NO.: 413-0018

LOCATION: TUSCALOOSA, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, <u>Ala. Code</u> §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, <u>Ala. Code</u> §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Issuance Date: DRAFT

Effective Date:

Expiration Date:

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Fed	rally Enforceable Provisos	Regulations
1.	<u>Transfer</u>	
	This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-1613(1)(a)5.	Rule 335-3-1602(6)
2.	Renewals	
	An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	Rule 335-3-1612(2)
	The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3.	Severability Clause	
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	Rule 335-3-1605(e)
4.	Compliance	
	(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	
	(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	Rule 335-3-1605(g)

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5.	Termination for Cause	
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	Rule 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-1605(i)
7.	Submission of Information	
	The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness:	
	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	Rule 335-3-1607(a)
10.	Inspection and Entry	
	Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized	Rule 335-3-1607(b)

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	_	esentatives of the Alabama Department of Environmental agement and EPA to conduct the following:		
	(a)	Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;		
	(b)	Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	L.	
	(c)	Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;		
	(d)	Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.		
11.	Com	pliance Provisions		
	(a)	The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-1607(c)	
	(b)	The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.		
12.	Com	pliance Certification		
		empliance certification shall be submitted annually by ember $12^{ m th}$ each year.	Rule 335-3-1607(e)	
	(a)	The compliance certification shall include the following:		
		(1) The identification of each term or condition of this permit that is the basis of the certification;		
		(2) The compliance status;		
		(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-1605(c) (Monitoring and Recording Keeping Requirements);		

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		(4) Whether the compliance has been continuous or intermittent;	
		(5) Such other facts as the Department may require to determine the compliance status of the source;	
	(b)	The compliance certification shall be submitted to:	
	Alab	pama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463	
		and to:	
	En	aforcement and Compliance Assurance Division EPA Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303	
3.	Reop	ening for Cause	
		r any of the following circumstances, this permit will be ened prior to the expiration of the permit:	Rule 335-3-1613(5
	(a)	Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.	
	(b)	Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.	
	(c)	The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.	

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(d)	The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	
1. <u>Ac</u>	ditional Rules and Regulations	
ex an	is permit is issued on the basis of Rules and Regulations isting on the date of issuance. In the event additional Rules d Regulations are adopted, it shall be the permit holder's sponsibility to comply with such rules.	§22-28-16(d), Code of Alabama 1975, as amended
5. <u>Ec</u>	uipment Maintenance or Breakdown	
(a)	In case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:	Rule 335-3-107(1),(2)
	(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
	(2) The expected length of time that the air pollution control equipment will be out of service;	
	(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
	(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; and	
	(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
(b)	In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day	

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	and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.		
16.	Operation of	of Capture and Control Devices	
	this permit times in a contaminan equipment	is properly operated and maintained so as to the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended
17.	<u>Obnoxious</u>	<u>Odors</u>	
	obnoxious of by Air Divisemissions of Alabama	t is issued with the condition that, should odors arising from the plant operations be verified sion inspectors, measures to abate the odorous shall be taken upon a determination by the epartment of Environmental Management that ares are technically and economically feasible.	Rule 335-3-108
18.	Fugitive Du	<u>ıst</u>	
	eman	nutions shall be taken to prevent fugitive dust nating from plant roads, grounds, stockpiles, ns, dryers, hoppers, ductwork, etc.	Rule 335-3-402
	the f airbo follov	or haul roads and grounds will be maintained in following manner so that dust will not become rne. A minimum of one, or a combination, of the ving methods shall be utilized to minimize airborne from plant or haul roads and grounds:	
	(1)	By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
	(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
	(3)	By paving;	

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	01	(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions.		
	adeq grou exclu cont Alter	ald one, or a combination, of the above methods fail to uately reduce airborne dust from plant or haul roads and ads, alternative methods shall be employed, either sively or in combination with one or all of the above rol techniques, so that dust will not become airborne. In native methods shall be approved by the Department to utilization.		
19.	<u>Addi</u>	tions and Revisions		
	-	modifications to this source shall comply with the fication procedures in Rules 335-3-1613 or 335-3-16-	Rule 335-3-1613 and .14	
20.	Reco	ordkeeping Requirements		
	(a)	Records of required monitoring information of the source shall include the following:	Rule 335-3-1605(c)(2	
		(1) The date, place, and time of all sampling or measurements;		
		(2) The date analyses were performed;		
		(3) The company or entity that performed the analyses;		
		(4) The analytical techniques or methods used;		
		(5) The results of all analyses; and		
		(6) The operating conditions that existed at the time of sampling or measurement.		
	(b)	Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.		

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21.	Rep	orting Requirements	
	(a)	Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-1604(9).	Rule 335-3-1605(c)(3)
	(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22.	<u>Emi</u>	ssion Testing Requirements	
	Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.		Rule 335-3-105(3) and Rule 335-3-1- .04(1)
	adva as p	Air Division must be notified in writing at least 10 days in ance of all emission tests to be conducted and submitted troof of compliance with the Department's air pollution rol rules and regulations.	
	proc	avoid problems concerning testing methods and edures, the following shall be included with the ication letter:	
	(a)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	Rule 335-3-104
	(b)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).	

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	(c)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
	(d)	A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
	owne and	etest meeting may be held at the request of the source er or the Air Division. The necessity for such a meeting the required attendees will be determined on a case-by- basis.	Rule 335-3-104
	30 d	est reports must be submitted to the Air Division within days of the actual completion of the test unless an asion of time is specifically approved by the Air Division.	
23.	Pay:	ment of Emission Fees	
		ual emission fees shall be remitted each year according to fee schedule in ADEM Admin. Code r. 335-1-704.	Rule 335-1-704
24.	Oth	er Reporting and Testing Requirements	
	anal be re cont	mission of other reports regarding monitoring records, fuel yses, operating rates, and equipment malfunctions may equired as authorized in the Department's air pollution rol rules and regulations. The Department may require sion testing at any time.	Rule 335-3-104(1)
25.	<u>Title</u>	e VI Requirements (Refrigerants)	
	inclu Clas 82, S mair pers	facility having appliances or refrigeration equipment, ading air conditioning equipment, which use Class I or is II ozone-depleting substances as listed in 40 CFR Part Subpart A, Appendices A and B, shall service, repair, and intain such equipment according to the work practices, onnel certification requirements, and certified recycling recovery equipment specified in 40 CFR Part 82, Subpart	40 CRR Part 82
	I or (erson shall knowingly vent or otherwise release any Class Class II substance into the environment during the repair, icing, maintenance, or disposal of any device except as ided in 40 CFR Part 82, Subpart F.	

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	reco	rdkeep	nsible official shall comply with all reporting and bing requirements of 40 CFR 82.166. Reports shall ted to the US EPA and the Department as required.	
26.	Che	mical		
	a pr	ocess	cal listed in Table 1 of 40 CFR 68.130 is present in in quantities greater than the threshold quantity able 1, then:	40 CFR Part 68
	(a)		owner or operator shall comply with the provisions 0 CFR Part 68.	
	(b)	The	owner or operator shall submit one of the following:	
		(1)	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a) or,	
		(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27.	<u>Disp</u>	lay of	<u>Permit</u>	
	at th locat	ie site ted ar	t shall be kept under file or on display at all times where the facility for which the permit is issued is and will make the permit readily available for by any or all persons who may request to see it.	Rule 335-3-14- .01(1)(d)
28.	Circ	umve	ntion_	
	devidente dilut	ce or a ne tota ces ar	shall cause or permit the installation or use of any ny means which, without resulting in the reduction al amount of air contaminant emitted, conceals or my emission of air contaminant which would violate the Division 3 rules and regulations.	Rule 335-3-110
29.	<u>Visil</u>	ole En	nissions	
	perm discl than sour	nit, an narge 20% ce dis	erwise specified in the Unit Specific provisos of this ny source of particulate emissions shall not more than one 6-minute average opacity greater in any 60-minute period. At no time shall any charge a 6-minute average opacity of particulate greater than 40%. Opacity will be determined by	Rule 335-3-401(1)

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		CFR Part 60, Appendix A, Method 9, unless otherwise cified in the Unit Specific provisos of this permit.	
30.	<u>Fuel</u>	l-Burning Equipment	
	(a)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Rule 335-3-403.	Rule 335-3-403
	(b)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Rule 335-3-501.	Rule 335-3-501
31.	Proc	cess Industries - General	
	pern	ess otherwise specified in the Unit Specific provisos of this mit, no process may discharge particulate emissions in ess of the emissions specified in Rule 335-3-404.	Rule 335-3-404
32.	Ave	eraging Time for Emission Limits	
	for t	ess otherwise specified in the permit, the averaging time the emission limits listed in this permit shall be the ninal time required by the specific test method.	Rule 335-3-105
33.	Com	npliance Assurance Monitoring (CAM)	
	appl requ emis	ditions (a) through (d) that follow are general conditions licable to emissions units that are subject to the CAM airements. Specific requirements related to each ssions unit are contained in the unit specific provisos and attached CAM appendices.	
	(a)	Operation of Approved Monitoring	40 CFR 64.7
		(1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
		(2) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including	

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	but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3)	Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	
(4)	Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to	

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	below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
(5)	Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
	Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.	40 CFR 64.8

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(2)	Elements of a QIP:	
	A. The owner or operator shall maintain a writte QIP, if required, and have it available for inspection.	
	B. The plan initially shall include procedures for evaluating the control performance problem and, based on the results of the evaluation procedures, the owner or operator shall modified the plan to include procedures for conducting one or more of the following actions, a appropriate:	s n y g
	(i) Improved preventive maintenance practices.	е
	(ii) Process operation changes.	
	(iii) Appropriate improvements to contro methods.	51
	(iv) Other steps appropriate to correct contro performance.	ol
	(v) More frequent or improved monitorin (only in conjunction with one or mor steps under paragraphs (2)(b)(i) throug (iv) above).	e
(3)	If a QIP is required, the owner or operator shadevelop and implement a QIP as expeditiously a practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.	s e d
(4)	Following implementation of a QIP, upon an subsequent determination pursuant to Sectio 33(a)(4)(b) above, the Department may require the an owner or operator make reasonable changes the QIP if the QIP is found to have:	n at
	A. Failed to address the cause of the control device performance problems; or	е
	B. Failed to provide adequate procedures for correcting control device performance problem as expeditiously as practicable in accordance.	s

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				good air pollution control practices for mizing emissions.	
	(5)	or existence existence fed	opera sting sting ordke eral,	ntation of a QIP shall not excuse the owner tor of a source from compliance with any emission limitation or standard, or any monitoring, testing, reporting or reping requirement that may apply under state, or local law, or any other applicable tents under the Act.	
(c)	Rep	orti	ng an	nd Recordkeeping Requirements	40 CFR 64.9
	(1)	Geı	neral	reporting requirements	
		A.	33(a) mus requ shall perm	irements of this part, the owner or operator	
		В.	inclurequ 160	port for monitoring under this part shall ade, at a minimum, the information ired under ADEM Admin. Code r. 335-3-05(c)3. and the following information, as icable:	
			(i)	Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
			(ii)	Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and	
			(iii)	A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next	

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	summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	
(2) Ge	neral recordkeeping requirements.	
A.	The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-1605(c)2 The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).	
В.	Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) Saving	s Provisions	40 CFR 64.10
(1) No	thing in this part shall:	
A.	Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the	

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	purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.	
	B. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.	
	C. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	
34.	Emissions Inventory Reporting Requirements	
	In order to meet the statewide emissions inventory reporting requirements under 40 CFR 51, Appendix A, the Permittee shall comply with the reporting requirements under ADEM Admin. Code r. 335-3115.	Rule 335-3-115
35.	Permit Shield	
	A permit shield exists under this operating permit in accordance with ADEM Admin. Code r. 335-3-1610 in that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in the application for this permit. Under this shield, it has been determined that requirements listed as non-applicable in the application are not applicable to this source.	Rule 335-3-1610

Summary Page for Filler Production

Permitted Operating

Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 6-1	Roller Mill 1 with Baghouse	PM	Lesser of: 0.44 lb/hr or E = 3.59P 0.62	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
EP 6-1	Roller Mill 1 with Baghouse	Opacity	20%	Rule 335-3-401(1)
EP 6-2	Roller Mill 2 with Baghouse	PM	Lesser of: 0.44 lb/hr or E = 3.59P 0.62	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
EP 6-2	Roller Mill 2 with Baghouse	Opacity	20%	Rule 335-3-401(1)
EP 6-3	Three (3) Limestone Storage Silos with Baghouse	PM	Lesser or: 0.22 lb/hr or E = 3.59P 0.62	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
EP 6-3	Three (3) Limestone Storage Silos with Baghouse	Opacity	1%	40 CFR §60.472(d)
Fug-1, Fug-2, Fug-3 & Fug-4	Truck Unloading, Belt Conveyor 1 & 2 Transfer Points, & Rock Storage Tank	Opacity	1%	40 CFR §60.472(d)

Provisos for Filler Production

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401(1)
3.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-404(1), "Control of Particulate Emissions for Process Industries – General".	Rule 335-3-404(1)
4.	These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-1404 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
5.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	Rule 335-3-1002(47) 40 CFR §60.470(a)
6.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart A, "General Provisions".	Rule 335-3-1002(1) 40 CFR §60.1(a)
En	nission Standards	
1.	Visible emissions from Roller Mill 1 with Baghouse (EP 6-1) and Roller Mill 2 with Baghouse (EP 6-2) shall not exceed the opacity set by General Permit Proviso No. 29.	Rule 335-3-401(1)
2.	Visible emissions from the three (3) Limestone Storage Silos with Baghouse (EP 6-3), and fugitive sources including the Truck Unloading (Fug-1), Belt Conveyor 1 & 2 Transfer Points (Fug-2 & Fug-3), and the Rock Storage Tank (Fug-4) shall not exceed an opacity of 1%.	40 CFR §60.472(d)
3.	Particulate matter emissions from Roller Mill 1 with Baghouse (EP 6-1) shall not exceed the lesser of 0.44 lb/hr or the allowable set by Rule 335-3-404(1).	Rule 335-3-404(1) Rule 335-3-1404 (Anti-PSD)
4.	Particulate matter emissions from Roller Mill 2 with Baghouse (EP 6-2) shall not exceed the lesser of 0.44 lb/hr or the allowable set by Rule 335-3-404(1).	Rule 335-3-404(1) Rule 335-3-1404 (Anti-PSD)

Fee	derally Enforceable Provisos	Regulations
5.	Particulate matter emissions from the Three (3) Limestone Storage Silos with Baghouse (EP 6-3) shall not exceed the lesser of 0.22 lb/hr or the allowable set by Rule 335-3-404(1).	Rule 335-3-404(1) Rule 335-3-1404 (Anti-PSD)
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, Method 5 of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105
2.	If testing is required, Method 9 of 40 CFR Part 60, Appendix A-4 shall be used in the determination of opacity.	Rule 335-3-105
Em	nission Monitoring	
1.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9.	Rule 335-3-1605(c)(1)
2.	If visible emissions in excess of 10% are observed from Roller Mill 1 (EP 6-1) and/or Roller Mill 2 (EP 6-2), maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-1605(c)(1)
3.	If any visible emissions in excess of 1% are observed from the three (3) Limestone Storage Silos with Baghouse (EP 6-3), the Truck Unloading (Fug-1), Belt Conveyor 1 & 2 Transfer Points (Fug-2 & Fug-3), and/or the Rock Storage Tank (Fug-4), maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-1605(c)(1)
4.	After the corrective action has been performed, the facility shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-1605(c)(1)
5.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differential shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-1605(c)(1)

Fe	derally Enforceable Provisos	Regulations
Re	cordkeeping Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five (5) years.	Rule 335-3-1605(c)(2)
2.	The facility shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken.	Rule 335-3-1605(c)(2)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken.	Rule 335-3-1605(c)(2)
4.	The facility shall submit a written report of exceedances of the stack opacity to the Department semi-annually.	Rule 335-3-1605(c)(3)

Summary Page for 600-ton Filler Silo with Baghouse

Permitted Operating

Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 7-1	Filler Silo with Baghouse	PM	Lesser of:	
			0.36 lb/hr or	Rule 335-3-1404 (Anti-PSD)
			$E = 3.59P^{0.62}$	Rule 335-3-404(1)
EP 7-1	Filler Silo with Baghouse	Opacity	1%	40 CFR §60.472(d)

Provisos for 600-ton Filler Silo with Baghouse

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-404(1), "Control of Particulate Emissions for Process Industries – General".	Rule 335-3-404
4.	This source has enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-1404 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
<u>En</u>	nission Standards	
1.	Visible emissions from the Filler Silo with Baghouse (EP 7-1) shall not exceed the opacity set by General Permit Proviso No. 29.	Rule 335-3-401(1)(a) and (b)
2.	Θ	Rule 335-3-404(1)
	(EP 7-1) shall not exceed the lesser of 0.36 lbs/hr or the allowable set by Rule 335-3-404(1).	Rule 335-3-1404 (Anti-PSD)
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, Method 5 of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105
2.	If testing is required, Method 9 of 40 CFR Part 60, Appendix A-4, shall be used in the determination of opacity.	Rule 335-3-105
<u>En</u>	nission Monitoring	
1.	The Permittee shall perform a visual check, at least once per week, of the stack associated with this units. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-1605(c)(1)

Fe	derally Enforceable Provisos	Regulations
2.	After the corrective action has been performed, the Permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-1605(c)(1)
3.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of the baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differential across the Filler Silo with Baghouse (EP 7-1) shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-1605(c)(1)
<u>Re</u>	cordkeeping and Reporting Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five (5) years.	Rule 335-3-1605(c)(2)
2.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken.	Rule 335-3-1605(c)(2)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken.	Rule 335-3-1605(c)(2)
4.	The Permittee shall submit a written report of exceedances of the stack opacity to the Department semi-annually.	Rule 335-3-1605(c)(3)

Summary Page for Line 1 Backsurfacing Silo

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 8-5	Line 1 Backsurfacing Silo with Bin Vent	PM	E = $3.59(P)^{0.62}$ or E = $17.31(P)^{0.16}$	Rule 335-3-404(1)
EP 8-5	Line 1 Backsurfacing Silo with Bin Vent	Opacity	1%	40 CFR §60.472(d)

Provisos for Line 1 Backsurfacing Silo

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions". – Visible Emissions".	Rule 335-3-401
3.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-404(1), "Control of Particulate Emissions for Process Industries – General".	Rule 335-3-404
4.	This source is subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	Rule 335-3-1002(47) 40 CFR §60.470(A)
5.	This source is subject to the applicable requirements of 40 CFR 60 Subpart A, "General Provisions".	Rule 335-3-1002(1)
6.	For particulate matter emissions, these sources are subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso No. 33.	40 CFR §60.1(a) 40 CFR Part 64
En	nission Standards	
1.	This unit shall not discharge into the atmosphere emissions with opacity greater than 1%.	40 CFR §60.472(d)
2.	Particulate matter emissions from these units shall not exceed the allowable set by Rule 335-3-404(1).	Rule 335-3-404(1)
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, Method 5 of 40 CFR Part 60, Appendix A-3, shall be used in the determination of particulate matter emissions.	Rule 335-3-105
2.	If testing is required, Method 9 of 40 CFR Part 60, Appendix A-4, shall be used in the determination of opacity.	Rule 335-3-105
<u>En</u>	nission Monitoring	
1.	The Permittee shall perform a visual check, at least once per week, of the stack associated with this unit (EP 8-5). This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective action to reduce the visible emissions are to be	Rule 335-3-1605(c)(1)

Fe	derally Enforceable Provisos	Regulations
	initiated within two (2) hours. Any repairs of observed problems shall be recorded.	
2.	After the corrective action has been performed, the Permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-1605(c)(1)
3.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of the Backsurfacing Silo baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differential shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-1605(c)(1)
Re	cordkeeping and Reporting Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five (5) years.	Rule 335-3-1605(c)(2)
2.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken.	Rule 335-3-1605(c)(2)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)(2)
4.	The Permittee shall submit a written report of exceedances of the stack opacity to the Department semi-annually.	Rule 335-3-1605(c)(3)

Summary Page for Shingle Manufacturing Line 2 with Granule Application System and Asphalt Storage

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 2-1	Asphalt Coater, Horizontal Mixer, Surge Tank, Sealant Applicators, Sealant Use Tank, Adhesive Applicators, and Adhesive Use/Mix Tank controlled by common HVAF	PM	0.06 lb/ton of asphalt shingles produced	40 CFR §63.11561(b), Table 2 to Subpart AAAAAAA
EP 2-1	Asphalt Coater, Horizontal Mixer, Surge Tank, Sealant Applicators, Sealant Use Tank, Adhesive Applicators, and Adhesive Use/Mix Tank controlled by common HVAF	Opacity	20%	40 CFR §60.472(a)(2)
EP 2-1	Two (2) 100,000 Gallon Asphalt Storage Tanks, a 15,000 Gallon Sealant Storage Tank, and a 15,000 Gallon Adhesive Storage Tank controlled by HVAF common to Asphalt Coater process	Opacity	0%	40 CFR §60.472(c)
EP 2-2	Granule Application System and Filler Heater with Baghouse	PM	9.24 lb/hr	40 CFR §60.472(a)(1) Rule 335-3-1404 (Anti-PSD)
EP 2-2	Granule Application System and Filler Heater with Baghouse	Opacity	20%	Rule 335-3-401(1)

Provisos for Shingle Manufacturing Line 2 with Granule Application System and Asphalt Storage

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-404(1), "Control of Particulate Emissions for Process Industries – General".	Rule 335-3-404
4.	The Granule Application System and Filler Heater with Baghouse (EP 2-2) has an enforceable limit in place in order to prevent it from being subject to the provisions of ADEM Admin. Code r. 335-3-1404 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
5.	The coater and storage tanks are subject to the applicable	Rule 335-3-1002(47)
	requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR §60.470(a)
6.	These sources are subject to the applicable requirements of 40 CFR	Rule 335-3-1002(1)
	60 Subpart A, "General Provisions".	40 CFR §60.1(a)
7.	The Asphalt Coater (EP 2-1) is subject to the applicable	Rule 335-3-1106(156)
	requirements of 40 CFR 63, Subpart AAAAAA, "National Emissions Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing".	40 CFR §63.11559(a), (b)(2)
8.	The Asphalt Coater is subject to the applicable requirements of 40	Rule 335-3-1106(1)
	CFR 63 Subpart A, "General Provisions" as listed in Table 5 of 40 CFR 63 Subpart AAAAAAA.	40 CFR §63.11565
9.	For particulate matter emissions, the Granule Application System and Filler Heater with Baghouse (EP 2-2) is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso No. 33.	40 CFR Part 64
En	nission Standards	
1.	Visible emissions from the Granule Application System and Filler Heater (EP 2-2) shall not exceed the opacity set by General Permit Proviso No. 29.	Rule 335-3-401(1)

Federally Enforceable Provisos		Regulations
2.	The exhaust gases from the Asphalt Coater (EP 2-1) shall not exceed an opacity greater than 20%.	40 CFR §60.472(a)(2)
3.	The Asphalt Coater High Velocity Air Filter (HVAF) shall not discharge any visible emission for more than 20 percent of any period of consecutive valid observations totaling 60 minutes.	40 CFR §60.472(a)(3)
4.	The exhaust gases from any Asphalt Storage Tanks, the Sealant Storage Tank, and the Adhesive Storage Tank shall not exceed an opacity greater than 0%, 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 are ducted to a control device for a saturator/coater, the combined emissions shall meet the emission limit contained in 40 CFR §60.472(a) during the time the saturator/coater control device is operating. At any other time, the asphalt storage tanks must meet the opacity limit specified above for storage tanks.	40 CFR §60.472(c)
5.	Particulate Matter emissions from the Asphalt Coater (EP 2-1) shall	40 CFR §63.11561(b)
	not exceed 0.06 lb/ton of asphalt shingles produced.	40 CFR §60.472(a)(1)(i)
		Rule 335-3-404(1)
6.	Particulate Matter emissions from the Granule Application System and Filler Heater (EP 2-2) shall not exceed 9.24 lbs/hr.	Rule 335-3-1404 (Anti-PSD)
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required to demonstrate compliance with Emission Standard No. 5, Method 5A of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105 40 CFR 63 Subpart AAAAAAA, Table 3
2.	If testing is required to demonstrate compliance with Emission Standard No. 6, Method 5 of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105
3.	If testing is required to demonstrate compliance with Emission Standards No. 1, 2, and 4, Method 9 of 40 CFR Part 60, Appendix A-4 shall be used in the determination of opacity.	Rule 335-3-105 40 CFR §60.474(c)(5)
4.	If testing is required to demonstrate compliance with Emission Standard No. 3, Method 22 of 40 CFR Part 60, Appendix A-7 shall be used to determine the presence of visible emissions. Readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR §60.8(c)) totaling 60 minutes. A performance test shall consist of one run.	Rule 335-3-105 40 CFR §60.474(d)
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Fe	derally Enforceable Provisos	Regulations
En	nission Monitoring	
1.	Emission monitoring requirements for the Granule Application under 40 CFR Part 64, "Compliance Assurance Monitoring", can be found in Appendix A.	40 CFR Part 64
2.	The inlet temperature of the HVAF (EP 2-1) shall be continuously monitored and recorded. The monitoring device shall have an accuracy of plus or minus 25 degrees Fahrenheit over its range.	40 CFR §60.473(a)
3.	The Permittee shall continuously (at least once every 15 minutes) monitor the HVAF inlet temperature and pressure differential. The HVAF inlet temperature and pressure differential shall be reduced to 3-hour averages. The temperature 3-hour averages shall be less than the manufacturer-specified operating temperature, and the pressure differential shall be less than the 3-hour average established in the most recent compliance test.	40 CFR §63.11562(b)(3) 40 CFR §63.11563(a), Table 4
4.	The Permittee must develop and make available for inspection, upon request, a site-specific monitoring plan for each monitoring system that addresses the requirements of 63.11563(a).	40 CFR §63.11563(b)
5.	The Permittee must install, operate, and maintain a continuous parameter monitoring system (CPMS) to maintain emissions limits specified in Table 2 to Subpart AAAAAAA per the applicable requirements in 40 CFR §863.11563(c), 63.11563(d), 63.11563(e), 63.11563(j), and 63.11563(k).	40 CFR §63.11563(c), §63.11563(d), §63.11563(e), §63.11563(j), §63.11563(k)
6.	If the facility proposes to use parameters or means other than those specified in Table 4 to Subpart AAAAAA to demonstrate continuous compliance with emissions limits specified in Table 2, an alternative monitoring plan must be submitted for approval.	§63.11563(h)
7.	At all times the facility must operate and maintain air pollution control and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions.	§63.11563(i)
8.	The facility must conduct a performance evaluation of each CPMS in accordance with the site-specific monitoring plan.	§63.11563(j)
9.	The facility must operate and maintain the CPMS in continuous operation according to the site-specific monitoring plan.	§63.11563(k)
10.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If visible emissions in excess of 15% opacity are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be	Rule 335-3-1605(c)(1)

Fe	derally Enforceable Provisos	Regulations
	initiated within two (2) hours. Any repairs of observed problems shall be recorded.	
11.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-1605(c)(1)
Re	cordkeeping and Reporting Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five (5) years.	Rule 335-3-1605(c)(2)
2.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken.	Rule 335-3-1605(c)(2)
3.	The Permittee shall maintain a record of all inlet temperature of the HVAF readings. This shall include all problems observed, excursions, and corrective actions taken.	Rule 335-3-1605(c)(2)
4.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken.	Rule 335-3-1605(c)(2)
5.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-1605(c)(3)
5.	The Permittee shall submit a semiannual compliance report in accordance with 40 CFR 63, Subpart AAAAAA as follows:	40 CFR 63.11564(b)
	(a) The report is due on July $31^{\rm st}$ for the January $1^{\rm st}$ through June $30^{\rm th}$ reporting period, and	
	(b) The report is due on January 31st for the July 1st through December 31st reporting period.	
6.	The Permittee must maintain records in accordance with the requirements of 40 CFR §63.11563(c)(1) through 40 CFR §63.11563(c)(10).	40 CFR 63.11564(c)

Summary Page for Line 2 Filler Handling System

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 3-1	1,440 Ton Filler Silo with Baghouse	Ton Filler Silo with Baghouse PM 0.54 lbs/hr		Rule 335-3-1404 (Anti-PSD)
EP 3-1	1,440 Ton Filler Silo with Baghouse	Opacity	1%	40 CFR §60.472(d)
EP 3-2	30 Ton Filler Receiving Bin with Baghouse	PM	0.37 lbs/hr	Rule 335-3-1404 (Anti-PSD)
EP 3-2	30 Ton Filler Receiving Bin with Baghouse	Opacity	1%	40 CFR §60.472(d)

Provisos for Line 2 Filler Handling System

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3.	These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-1404 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
4.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	Rule 335-3-1002(47) 40 CFR §60.470(A)
5.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart A, "General Provisions".	Rule 335-3-1002(1) 40 CFR §60.1(a)
Emission Standards		
1.	These units shall not discharge into the atmosphere emissions with opacity greater than 1%.	40 CFR §60.472(d) Rule 335-3-401(1)
2.	Particulate matter emissions from the 1440 ton Filler Silo (EP 3-1) shall not exceed 0.54 lb/hr.	Rule 335-3-1404 (Anti-PSD)
3.	Particulate matter emissions from the 30 ton Filler Receiving Bin (EP 3-2) shall not exceed 0.37 lb/hr.	Rule 335-3-1404 (Anti-PSD)
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, Method 5A of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105
2.	If testing is required, Method 9 of 40 CFR Part 60, Appendix A-	Rule 335-3-105
_	4 shall be used in the determination of opacity.	40 CFR §60.474(c)(5)
<u>En</u>	nission Monitoring	
1.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective	Rule 335-3-1605(c)(1)

Fe	derally Enforceable Provisos	Regulations
	action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	
2.	After the corrective action has been performed, the Permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-1605(c)(1)
3.	measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differentials shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-1605(c)(1)
Re	cordkeeping and Reporting Requirements	
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	Rule 335-3-1605(c)(2)
2.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)(2)
3.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-1605(c)(3)

Summary Page for Line 2 Granule Handling and Storage

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 4-1	Line 2 Granule Storage Transfer Points and 24 Storage Silos with Baghouse	PM	1.30 lb/hr	Rule 335-3-1404 (Anti-PSD)
EP 4-1 Line 2 Granule Storage Transfer Opacity Points and 24 Storage Silos with Baghouse		1%	40 CFR §60.472(d)	
EP 4-2	Line 2 Butt Granule Unloading and Transfer Points with Baghouse	PM	0.82 lb/hr	Rule 335-3-1404 (Anti-PSD)
EP 4-2	Line 2 Butt Granule Unloading and Transfer Points with Baghouse	Opacity	1%	40 CFR §60.472(d)
EP 4-3 Line 2 Headlap/Backsurfacing Unloading and Transfer Points with Baghouse		PM	0.82 lb/hr	Rule 335-3-1404 (Anti-PSD)
EP 4-3	Line 2 Headlap/Backsurfacing Unloading and Transfer Points with Baghouse	Opacity	1%	40 CFR §60.472(d)

Provisos for Line 2 Granule Handling and Storage

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3.	These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-1404 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
4.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	Rule 335-3-1002(47) 40 CFR §60.470(A)
5.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart A, "General Provisions".	Rule 335-3-1002(1) 40 CFR §60.1(a)
6.	For particulate matter emissions, these sources are subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso No. 33.	40 CFR Part 64
Emission Standards		
1.	These units shall not discharge into the atmosphere emissions with opacity greater than 1%.	40 CFR §60.472(d) Rule 335-3-401(1)
2.	Particulate matter emissions from the Line 2 Granule Storage Transfer Points and 24 Storage Silos with Baghouse (EP 4-1) shall not exceed 1.30 lbs/hr.	Rule 335-3-1404 (Anti-PSD)
3.	Particulate matter emissions from the Line 2 Butt Granule Unloading and Transfer Points with Baghouse (EP 4-2) shall not exceed 0.82 lbs/hr.	Rule 335-3-1404 (Anti-PSD)
4.	Particulate matter emissions from the Line 2 Headlap/BackSurfacing Unloading and Transfer Points with Baghouse (EP 4-3) shall not exceed 0.82 lbs/hr.	Rule 335-3-1404 (Anti-PSD)

Fe	derally Enforceable Provisos	Regulations
Со	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, Method 5 of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105
2.	If testing is required, Method 9 of 40 CFR Part 60, Appendix A-4 shall be used in the determination of opacity.	Rule 335-3-105 40 CFR §60.474(c)(3)
<u>En</u>	aission Monitoring	
1.	Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64
2.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-1605(c)(1)
3.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-1605(c)(1)
4.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differentials shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-1605(c)(1)
Re	cordkeeping and Reporting Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five (5) years.	Rule 335-3-1605(c)(2)
2.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken.	Rule 335-3-1605(c)(2)

Federally Enforceable Provisos		Regulations
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken.	Rule 335-3-1605(c)(2)
4.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-1605(c)(3)



Summary Page for Heat Transfer Fluid Heating System

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
HTF Heat Transfer Fluid Heating System including Three (3) 6 MMBtu/hr Heaters		PM	E=1.38H-0.44	Rule 335-3-403
HTF Heat Transfer Fluid Heating System including Three (3) 6 MMBtu/hr Heaters		4.0 lb/MMBtu	Rule 335-3-501(b)	
HTF	Heat Transfer Fluid Heating System including Three (3) 6 MMBtu/hr Heaters	NOx	N/A	N/A
HTF Heat Transfer Fluid Heating System including Three (3) 6 MMBtu/hr Heaters		СО	N/A	N/A
HTF Heat Transfer Fluid Heating System including Three (3) 6 MMBtu/hr Heaters		VOC	N/A	N/A
HTF	Heat Transfer Fluid Heating System including Three (3) 6 MMBtu/hr Heaters	Opacity	20%/40%	Rule 335-3-401(1)

Provisos for Heat Transfer Fluid Heating System

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-403, "Control of Particulate Emissions – Fuel Burning Equipment".	Rule 335-3-403
4.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401, "Control of Sulfur Compound Emissions – Fuel Combustion".	Rule 335-3-501
5.	These sources have an enforceable standard in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-1404 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
<u>En</u>	nission Standards	
1.	Visible emissions from these sources shall not exceed the opacity set by General Permit Proviso No. 29.	Rule 335-3-401(1)
2.	Particulate matter emissions from each heater shall not exceed the allowable set by Rule 335-3-403(1).	Rule 335-3-403(1)
3.	Sulfur dioxide emissions from each heater shall not exceed the allowable of 4.0 pounds per million BTU heat input as set by Rule 335-3-501(1).	Rule 335-3-501(1)
4.	These units shall combust natural gas only.	Rule 335-3-1404 (Anti-PSD)
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, Method 5 of 40 CFR Part 60, Appendix A-3 shall be used in the determination of particulate matter emissions.	Rule 335-3-105
2.	If testing is required, Method 6 of 40 CFR Part 60, Appendix A-4 shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-105

Fe	derally Enforceable Provisos	Regulations
3.	If testing is required, Method 9 of 40 CFR Part 60, Appendix A-4 shall be used in the determination of opacity.	Rule 335-3-105
<u>En</u>	nission Monitoring	
1.	This source is subject to no additional specific requirements other than those listed in the General Provisos.	N/A
Re	cordkeeping and Reporting Requirements	
1.	This source is subject to no additional specific requirements other than those listed in the General Provisos.	N/A

Appendix A – Continuous Assurance Monitoring (CAM)

Compliance Plan for EP 2-2 (Granule Application System and Filler Heater Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H ₂ O or greater than 8 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 4-1 (Line 2 Granule Storage Transfer Points and 24 Storage Silo Baghouse), EP 4-2 (Line 2 Butt Granule Unloading and Transfer Points Baghouse), and EP 4-3 (Line 2 Headlap/Backsurfacing Unloading and Transfer Points Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H ₂ O or greater than 8 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-5 (Line 1 Backsurfacing Silo Bin Vent)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H ₂ O or greater than 8 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
G. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
H. Verification of Operation Status	Not Applicable
I. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
J. Monitoring Frequency	Once daily during operation
K. Data Collection Procedures	The pressure differential will be recorded with date and time.
L. Averaging Period	Instantaneous