ENGINEERING ANALYSIS

PROJECT DESCRIPTION

On October 21, 2025, the Department received an application from Owens Corning Roofing and Asphalt, LLC, dated October 13, 2025, for the construction of an asphalt processing and asphalt roofing manufacturing facility located in Prattville, Autauga County, Alabama. Construction will occur at a greenfield site. The facility will be known as Owens Corning Prattville.

An inspection of the greenfield site was conducted on October 28, 2025, and the only soil disturbance was a well boring site. Other than signage for the future facility, there were no structures observed on the property.

ASPHALT PROCESSING PLANT DESCRIPTION

The facility will receive asphalt flux and other raw materials via truck and rail directly into storage tanks. A total of twelve (12) asphalt tanks are used for storing/handling any combination of raw asphalt flux or finished asphalt products. The asphalt tanks are heated using a dedicated hot oil heater (**EPN 5**). Liquid from asphalt tank fumes are collected in the BD Oil Tank 501 (**EPN 8**). BD oil is **b**io-oil **d**erived from biomass. The vapor asphalt tank fumes are routed to the Asphalt Fiber Bed Filter (**EPN 7**), then mixed with natural gas, and introduced into the Asphalt Plant Regenerative Thermal Oxidizer (RTO - **EPN 1**) as combustion air.

Asphalt flux is pumped into two asphalt oxidizing converters (Converters 1 and 2) where air is forced through the asphalt by positive displacement blowers through a series of baffles and piping. The blowing process is a batch process, which may be enhanced with polyphosphoric acid (PPA) from Tank 301. The purpose of polyphosphoric acid is to increase penetration values of asphalt. Fumes exit the oxidizing converters through a liquid seal within two knock-out tanks and are routed to a Direct Fired Thermal Oxidizer/Asphalt Preheater/Waste Heat Boiler (**EPN 2**). Liquid from the knock-out tanks is collected in BD Oil Tank 501 (**EPN 8**).

Oxidized asphalt, asphalt products, and BD Oil are stored in product storage tanks prior to shipment or use by the Roofing Plant. Emissions from all loading racks are filtered through the Asphalt Fiber Bed Filter and then captured at a 98% capture rate in the Asphalt Plant RTO (**EPN 1**). The remaining emissions from loading racks are considered fugitive emissions (**EPN 6**). If the RTO is offline for maintenance, emissions from the loading process will be controlled by the Asphalt Fiber Bed Filter (**EPN 7**). This will occur only if the RTO is out of service.

Sealant for use in roofing products is produced at the asphalt plant by mixing polymer from supersacks (**EPN 9**) with asphalt within the Wetting Tank. This product is known as polymer modified asphalt (PMA). The PMA is transferred to the MLA/MSA Tank 201 and/or 202 where it is combined with additional asphalt from Day Tank 7 along with a sulfur solution as needed to obtain the desired PMA properties. Once the desired properties have been met, the PMA is transferred to the roofing plant to one of the Sealant/Adhesive Storage Tanks.

The Asphalt Plant also operates one diesel-fired emergency generator (**EPN 10**) and two (2) 21 MMBtu/hr natural gas-fired boilers used for process heating (**EPN 3** and **EPN 4**).

ROOFING PLANT DESCRIPTION

Raw materials (limestone, sand, granules) are received at the Roofing Plant by truck and rail. Filler (limestone) and backdust (sand) are transferred pneumatically to storage silos equipped with baghouses (BH). Granules are dropped through a below grade grate and transferred pneumatically by a below grade conveyor (**EPN 29**) to the granule unloading/distribution silo. The emission points are listed below:

- Sand Silos – Sand Storage Silo BH #1 (**EPN 18),** Sand Storage Silo BH #2 (**EPN 19)**
- Limestone Silos (Filler) – Filler Storage BH #1 (**EPN 20**), Filler Storage BH #2 (**EPN 21**), Filler Storage BH #3 (**EPN 22**)
- Granule Unloading/Distribution Silo BH (**EPN 23**)

Sealants and adhesives are also received by the Roofing Plant and are stored in Sealant/Adhesive Storage Tank #1 or Sealant/Adhesive Tank #2. These tanks are heated by the Hot Oil Heater (**EPN 12**) and are vented to the Roofing Plant Regenerative Thermal Oxidizer (RTO – **EPN 17**) after passing through the Sealant/Adhesive Fiber Bed Filter.

The roofing line process begins with a roll of base material called fiberglass mat, which is placed on a reel and unwound onto a dry looper. The looper is a continuous process with a reservoir that allows continuous operation without shutting down the production line when a new roll of base material is added. A dust collector (**EPN 31)** over the unwind area is used for housekeeping purposes. An oiling system is then used to saturate the fiberglass mat with an asphalt modifier oil prior to the asphalt coating process. This oil is a heavy paraffinic distillate solvent stored in the Modified Oil Tank (**EPN 34**).

The next step in the roofing process is coating. Coating material is generated by mixing filler (limestone) from the silos that has been transferred to the Cold Filler Bin with Bin Vent inside the building (**EPN 16**). The filler is heated by hot oil and fed to the Hot Filler Heater controlled by the Hot Filler System Baghouse (**EPN 25**). The filler is then mixed with pure coating asphalt from the Asphalt Plant after passing through the natural gas-fired Coating Preheater (**EPN 15**). Particulate emissions from the Filler Mixer are controlled by the Roofing Plant Regenerative Thermal Oxidizer (RTO – **EPN 17**) after passing through the Coating Fiber Bed Filter. Asphalt vapors from the Filler Mixer are also controlled by the Roofing Plant Regenerative Thermal Oxidizer (RTO – **EPN 17**) by way of the Coating Surge Tank.

The fiberglass sheet moves through the Asphalt Coater where coating asphalt, which is asphalt mixed with filler (limestone), is applied to the top and bottom of the roll. Coating is continuously circulated between the Coating Surge Tank and the Asphalt Coater. Emissions from the Coating Surge Tank and the Coater are captured and sent through the Coating Fiber Bed Filter and Roofing Plant Regenerative Thermal Oxidizer (RTO – **EPN 17**).

After coating is applied to the sheet, surfacing granules and sand, release tape, or a strip of paint are applied to the sheet in the Material Surfacing Area. Most of the emissions from this area are captured and sent to the Roofing Process Baghouse (**EPN 31**). The remaining materials are released through the Building Roof Vent (**EPN 16**).

Next, the sheet is cooled directly by water sprays and indirectly through cooling drums in addition to outside air. Emissions from the cooling section are emitted through Building Roof Vent (**EPN 16**). A closed cooling tower system is used for chilled water and has no emissions.

After cooling, a finishing layer mixture is applied by the Finishing Layer Application System (**EPN 30**). During the cooling process, some of the sand and granules applied earlier in the Material Surfacing Area are lost to water spraying. These materials are reclaimed through a dryer/separator process (**EPN 36**), called the Surface Reclaim process. The Surface Reclaim process removes moisture from the materials and separates them into granules and sand. Reclamation is facilitated by the use of a natural gas-fired heater (**EPN 37**). Emissions from the reclamation process are released through the Building Roof Vent (**EPN 16**).

Following the cooling process and application of the finishing layer, both sealant and laminate adhesives are applied to the shingles by Sealant/Adhesive Applicators. The shingles are then processed as rolls or Mineral Surface rolls, or they can be cut and packaged. Both sealant and adhesive are used from the Sealant/Adhesive Use Tanks #1 and #2, which are heated by hot oil. Emissions from the Sealant/Adhesive Use Tanks and Applicators are captured by the Coating Fiber Bed Filter and Roofing Plant Regenerative Thermal Oxidizer (RTO – **EPN 17**). Emissions from Ink jet printers used for labeling are released through the Building Roof Vent (**EPN 16**).

In the roofing plant, there are two hot oil heaters used for tank heating, filler heating, and process heating. They are indicated as the Front End Hot Oil Heater (**EPN 12**) and the Back End Hot Oil Heater (**EPN 14**). Additionally, in this area, the plant will operate one (1) diesel-fired emergency engine (**EPN 32**) and two diesel tanks (**EPN 33** and **EPN 34**).

EMISSIONS

Potential emissions are based on 8,760 hours of operation and a process weight in excess of 1,000,000 shingles per year. Emissions were calculated by utilizing emission factors from EPA AP-42, the Asphalt Roofing Manufacturers Association (ARMA-2003), Trinity Consultants (2020), and Owens Corning Asphalt Technology Lab (Trumbore – 1999 & 2005). Other information was obtained from various equipment manufacturers and safety data sheets. The supporting documentation for these sources was included in Appendix E of the permit application. Based on the emissions in Table 1, this facility would be considered major source and subject to Title V permitting requirements. However, they would not be subject to Prevention of Significant Deterioration (PSD) requirements, as long as the facility operates control devices as discussed in this analysis.

TABLE 1: POTENTIAL PLANT-WIDE EMISSIONS (TPY)

Pollutant	Potential to Emit (TPY)	T5 Major Source Threshold	T5 Major Source Applicable	PSD Threshold (TPY)	PSD Applicable
PM_{10}	76.49	100	No	250	No
$PM_{2.5}$	61.49	100	No	250	No

Pollutant	Potential to Emit (TPY)	T5 Major Source Threshold	T5 Major Source Applicable	PSD Threshold (TPY)	PSD Applicable
SO_2	226.22	100	Yes	250	No
VOC	70.41	100	No	250	No
CO	127.66	100	Yes	250	No
NO_x	103.11	100	Yes	250	No
Formaldehyde	0.16	10	No	250	No
Carbonyl Sulfide	0.08	10	No	250	No
Total HAPs	4.95	25	No	250	No
H_2S	6.36	100	No	250	No

REGULATIONS

STATE REGULATIONS

ADEM Administrative Code Rule 335-3-1-.04, "Monitoring, Records, and Reporting"

This rule states that "The Director may require the owner or operator of any air contaminant source to establish and maintain such records; make such reports; install, use, and maintain such monitoring equipment or methods; sample such emissions in accordance with such methods at such locations, intervals, and procedures as the Director may prescribe; and provide such periodic emission reports as required in paragraph (2) of this Rule."

The Department cites this rule as the authority to stipulate monitoring, recordkeeping, and reporting requirements as needed to determine continuous compliance with operating and emission standards. Air permit conditions will require the facility to monitor and record the parameters for individual units and control devices including, but not limited to, the following:

ADEM Administrative Code Rule 335-3-4-.01, "Control of Particulate Emissions: Visible Emissions"

Rule 335-3-4-.01(1)(a) states that no person shall emit to the atmosphere from any source of emissions, particulate matter of an opacity greater than twenty percent (20%) over a six (6) minute period. **Rule 335-3-4-.01(1)(b)** states that during one six minute period in any sixty minute period a person may discharge into the atmosphere from any source of emissions, particulate of an opacity not greater than that designated as forty percent (40%) opacity. This facility would be subject to this regulation. If visible emissions are observed, Method 9 of 40 CRF Part 60, Appendix A-4 shall be used in the determination of opacity.

ADEM Administrative Code Rule 335-3-4-.02, "Control of Particulate Emissions: Fugitive Dust and Fugitive Emissions"

This rule requires work practices to be implemented for fugitive sources in order to prevent particulate matter (PM) from becoming airborne. **Rule 335-3-4-.02(1)** states the facility must take reasonable precautions to prevent fugitive dust from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc. A minimum of one or a combination of the following precautions must be utilized for plant or haul roads or grounds:

1. 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. Reduction of vehicular traffic speed to a point below that at which dust emissions are created;
3. Paving of roads; or
4. Application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions.

Title V facilities are required to propose and implement a fugitive dust plan. This plan for the Owens Corning plant shall be included in the facility's initial Title V major source operating permit application, which is due within one year of startup of the facility.

ADEM Administrative Code Rule 335-3-4-.03, "PM: Control of Particulate Emissions: Fuel Burning Equipment"

Autauga County is **not** classified as a Class 1 county and is therefore a Class 2 county. However, **Rule 335-3-4-.03(4)** states that **new** fuel-burning sources emitting particulate matter (PM) shall be subject to the rules and regulations for Class 1 Counties. For Class 1 counties, **Rule 335-3-4-.03(1)** states that no person shall cause or permit the emission of PM from fuel-burning equipment in a Class 1 County in excess of the amount determined by the equation below:

$$\mathbf{E=1.28H^{-0.44}}$$

Where E = Emissions in lb/million BTU
And H = Heat Input in millions of BTU/hr

Using this equation and Table 4-1 of this rule, the allowable particulate matter based on heat input of the proposed fuel burning units is shown below in Table 2:

TABLE 2: FUEL BURNING EQUIPMENT ALLOWABLE PARTICULATE MATTER EMISSIONS

Proposed Unit	Emission Point	MMBTU/hr Heat Input	Allowable PM (lb/MMBtu)
Asphalt Plant Regenerative Thermal Oxidizer (RTO)	EPN 1	2.4	0.50
Direct Fired Thermal Oxidizer	EPN 2	22.0	0.37
Asphalt Preheater	EPN 2	35.0	0.37
Asphalt Boiler 1	EPN 3	21.0	0.37
Asphalt Boiler 2	EPN 4	21.0	0.37
Asphalt Tank Hot Oil Heater	EPN 5	10.0	0.50
Natural Gas Facility Heater	EPN 11	50.0	0.27

Front End Hot Oil Heater	EPN 12	1.5	0.50
Filler Hot Oil Heater	EPN 13	9.0	0.50
Back End Hot Oil Heater	EPN 14	1.5	0.50
Coating Preheater	EPN 15	9.0	0.50
Roofing Plant Regenerative Thermal Oxidizer (RTO)	EPN 17	1.6	0.50
Surface Reclaim Heater	EPN 37	2.0	0.50

ADEM Administrative Code Rule 335-3-4-.04, "Control of Particulate Emissions: Process Industries - General"

Per **Appendix A to Rule 334-3,** Autauga County is a classified as a Class I County**.**

Rule 335-3-4-.04(1) states that no source in a Class I County shall emit particulate matter in any one hour in excess of the amount shown in **Table 4-2 – Allowable Particulate Matter Emission Based on Process Rate Rule**. For sources in a Class I County, interpolation of the data in Table 4.2 is determined by the equations below:

When P<30, $\mathbf{E=3.59P^{0.62}}$**,** and
When P≥30, $\mathbf{E=17.31P^{0.16}}$

Where P = Process weight per hour in tons per hour
And E = Emissions in pounds per hour

The following sources are subject to the requirements of this rule:

- Asphalt Converters (Batch Blowing Process)
- Asphalt Fiber Bed Filter during RTO downtime
- Polymer Handling Process for Modified Asphalt
- Shingle Sealant/Adhesive Applications
- Shingle Cooling Process
- Materials Surfacing Area (MSA)/Reclamation Process
- Shingle Coating Process
- Granule Unloading Process
- Finishing Layer Application Process

ADEM Administrative Code Rule 335-3-5-.01, "Control of Sulfur Compound Emissions: Fuel Combustion"

Rule 33-3, Appendix B – Sulfur Dioxide Priority Classifications of Counties lists all Category I and Category II counties in Alabama and shows that Autauga County is a Category II County. **Rule 335-3-5-.01(b)** states that no person shall cause or permit the operation of a fuel burning installation in a Sulfur Dioxide (SO_2) Category II County in such a manner that sulfur oxides, measured as sulfur dioxide, are emitted in excess of 4.0 lb/MMBtu heat input. The units shown in Table 2 above are subject to this rule.

ADEM Administrative Code Rule 335-3-6-.03, "Control of Organic Emissions: Loading and Storage of VOC"

Rule 335-3-6-.03(a) applies to VOCs with a true vapor pressure greater than or equal to 1.5 psia under storage conditions. Flux Asphalt, Oxidized Asphalt, Modifier Oil (Hydrolene), BD Oil, and Diesel fuel have a true vapor pressure less than 1.5 psia; therefore, this rule does not apply to the storage tanks at the Owens Corning facility.

ADEM Administrative Code, Rule 335-3-14-.04*, *"Prevention of Significant Deterioration (PSD) Permitting"

The controlled potential emissions of the Owens Corning facility located in Table 1 of this analysis indicate that the proposed facility would not exceed the PSD significance threshold of 250 TPY for any regulated NSR pollutant as long as the control devices for the units are properly operated and maintained in accordance with manufacturers' written instructions.

The combination of all fossil fuel burning boilers do not exceed 250 MMBtu/hr, and asphalt processing and roofing manufacturing are not listed on the list of 28. Therefore, per ADEM Admin. Code r. 335-3-14-.04(8)(d)7., Owens Corning is not required to consider fugitive emissions when determining if the facility's PTE would exceed 250 TPY.

The facility proposed an asphalt throughput limit of 292,000 tons per year, a limit of 1,900 tons per year of asphalt processed during Asphalt Plant RTO maintenance (and a limit of 500 hours per year of RTO maintenance), and a polymer throughput limit of 1,000 tons per year. These limits have been established primarily to prevent the release of Sulfur Dioxide (SO_2) from the asphalt converters.

Individual source emissions from the plant are shown in Table 5.

TABLE 5: CONTROLLED POTENTIAL EMISSIONS (TPY) BY EMISSION SOURCE

EPN	Unit	PM	PM_{10}	$PM_{2.5}$	VOC	CO	NOx	SO_2	Total HAPs
*1**	*Asphalt Plant RTO*	5.6398	5.6398	5.6398	19.6340	5.6061	1.0306	48.9716	0.0551
*2**	*Direct Fired TO*	15.876	15.0002	12.3722	4.9962	66.5502	36.0105	156.9509	3.6287
3	*Asphalt Boiler 1*	0.6853	0.6853	0.6853	0.4960	7.5748	9.0176	0.0541	0.1702
4	*Asphalt Boiler 2*	0.6853	0.6853	0.6853	0.4960	7.5748	9.0176	0.0541	0.1702
5	*Asphalt Tanks Hot Oil Heater*	0.3264	0.3264	0.3264	0.2362	3.6071	4.2941	0.0258	0.0811
6	*Asphalt/BD Oil Loading*	0.0162	0.0162	0.0162	0.0575	0.2919	--	--	0.0029
7	*Asphalt Fiber Bed Filter during (RTO Downtime)*	0.6279	0.6279	0.6279	22.2604	5.4281	--	--	0.0362

EPN	Unit	PM	PM_{10}	$PM_{2.5}$	VOC	CO	NOx	SO_2	Total HAPs
8	*BD Oil Tank 501*	0.0012	0.0012	0.0012	0.0012	0.0202	--	--	--
9	*Polymer Handling*	0.0022	0.0022	0.0022	--	--	--	--	--
10	*Asphalt Plant Emergency Gen.*	0.1829	0.1829	0.1829	0.1646	0.1463	5.8512	0.0028	0.0031
11	*Natural Gas Facility Heater*	1.6318	1.6318	1.6318	1.1809	18.0353	21.4706	0.1288	0.4054
12	*Front End Hot Oil Heater*	0.0490	0.0490	0.0490	0.0490	0.5411	0.6441	0.0039	0.0122
13	*Filler Hot Oil Heater*	0.2937	0.2937	0.2937	0.2126	3.2464	3.8647	0.0232	0.0730
14	*Back End Hot Oil Heater*	0.0490	0.0490	0.0490	0.0490	0.5411	0.6411	0.0039	0.0122
15	*Coating Preheater*	0.2937	0.2937	0.2937	0.2126	3.2464	3.8647	0.0232	0.0730
*16**	*Roof Venting*	18.1410	18.4343	6.1485	7.6245	0.0006	0.0000	0.0000	0.0001
*17**	*Roofing Plant RTO*	0.1992	0.1992	0.1992	5.0412	1.7488	0.6871	27.9671	0.1205
18	*Sand Silo #1 BH*	2.2526	2.2526	2.2526	--	--	--	--	--
19	*Sand Silo #2 BH*	2.2526	2.2526	2.2526	--	--	--	--	--
20	*Filler Storage Silo #1 BH*	3.1866	3.1866	3.1866	--	--	--	--	--
21	*Filler Storage Silo #2 BH*	3.1866	3.1866	3.1866	--	--	--	--	--
22	*Filler Storage Silo #3 BH*	3.1866	3.1866	3.1866	--	--	--	--	--
23	*Granule Unloading BH*	6.0069	6.0069	6.0069	--	--	--	--	--
24	*Granule Storage BH*	1.8771	1.8771	1.8771	--	--	--	--	--
25	*Hot Filler System BH*	0.7400	0.7400	0.7400	--	--	--	--	--
26	*Sand Use Bin Baghouse*	0.7400	0.7400	0.7400	--	--	--	--	--
27	*Prime Granule Use Bin Baghouse*	0.7400	0.7400	0.7400	--	--	--	--	--
28	*Headlap Use Bin Baghouse*	0.7400	0.7400	0.7400	--	--	--	--	--
29	*Granules Rail/Truck Unloading*	0.0119	0.0119	0.0119	--	--	--	--	--
30	*Finishing Layer Application*	--	--	--	7.5087	--	--	--	0.0876

EPN	Unit	PM	PM_{10}	$PM_{2.5}$	VOC	CO	NOx	SO_2	Total HAPs
31	*Roofing Process Baghouse*	6.0069	6.0069	6.0069	--	--	--	--	--
32	*Roofing Plant Diesel Emergency Gen.*	0.1829	0.1829	0.1829	0.1646	0.1463	5.8512	0.0028	0.0031
33	*Diesel Tank*	--	--	--	0.0003	--	--	--	--
34	*Modifier Oil Tank*	--	--	--	0.0001	--	--	--	--
35	*Trackmobile Diesel Tank*	--	--	--	0.0021	--	--	--	--
36	*Dryer/Separator Baghouse*	1.2014	1.2014	1.2014	--	--	--	--	--
37	*Surface Reclaim Heater*	0.0653	0.0653	0.0653	0.0472	0.7214	0.8533	0.0052	0.0162
Total		**77.3778**	**76.4876**	**61.4890**	**70.4105**	**127.6582**	**103.1070**	**226.2173**	**4.9509**

**NOTE: Asphalt Plant Regenerative Thermal Oxidizer (RTO – EPN 1) contributing sources are the Asphalt Plant RTO burners, the Asphalt Tanks, Asphalt Loading Racks and BD Oil Loading; the Direct Fired Thermal Oxidizer (EPN 2) contributing sources are the Asphalt Converters and the Asphalt Preheater; the Roofing Plant Vent (EPN 16) contributing sources are the Material Surfacing Area, the cooling section, the Sealant/Adhesive Applicators, the Ink Jet Printers, the Nail Line Painting, and the Granule/Sand Handling area; the Roofing Plant Regenerative Thermal Oxidizer (RTO – EPN 17) contributing sources are the Roofing Sealant/Adhesive Tanks, the Coater Surge Tank, the Coater, the Sealant/Adhesive Applicators, and the RTO burners.*

Based on the review of the facility emissions calculations and PSD avoidance limits, a PSD review is not required at this time. Monitoring and reporting to demonstrate compliance with these limits is detailed in the permits.

ADEM Admin. Rule 335-3-14-.06, "Determinations for Major Sources in Accordance with Clean Air Act Section 112(g)"

A 112(g) case by case MACT review would not be necessary since the potential Hazardous Air Pollutant (HAP) emissions do not exceed the threshold of 10 TPY for any individual HAP or 25 TPY for any combination of HAPs.

ADEM Administrative Code, Rule 335-3-16, "Major Source Operating Permits"

The major source threshold for Title V is 100 TPY for regulated air pollutants as defined in ADEM Admin. Code r. 3353-16-.01(1)(w), 10 TPY for a single HAP and 25 TPY for a combination of HAPs. The proposed facility emissions exceed 100 TPY for SO_2, CO, and NOx; therefore, the facility would be classified as a major source and will be required to obtain a Major Source Operating Permit (MSOP). Owens Corning is required to submit an initial Title V application within one year of start-up of these operations.

ADEM Administrative Code, Rule 335-3, "Area Classification – Class I Area"

The Sipsey Wilderness Area is classified as a Class I area. Sipsey Wilderness area is the closest federal land to the new Owens Corning Plant. The facility is located approximately 121 kilometers (km) from Sipsey Wilderness Area. Therefore, the emissions from the new facility are not expected to have a significant impact on the Class I area.

FEDERAL REGULATIONS

40 CFR Part 60, Subpart A, "General Provisions" [ADEM Admin. Code r. 335-3-10-.02(1)]

This subpart is applicable provided that the facility is subject to one of the applicable subparts found under 40 CFR Part 60. Table 8 to Subpart IIII specifies the general provisions that apply to affected engine facilities.

40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" [ADEM Admin. Code r. 335-3-10-.02(2)(c)]

Applicability

Per **§ 60.40c(a)**, each steam generating unit that was constructed after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr is subject to the requirements of this rule. Owens Corning is subject to ***40 CFR 60 Subpart Dc*** for the natural gas-fired Asphalt Boiler #1 (EPN 3) and the Asphalt Boiler #2 (EPN 4) that will be located at the facility. The remaining indirect fired sources to be constructed at the facility meet the definition of "process heater" in **§ 60.41c**. Process heaters are not included in the definition of "steam generating unit"; therefore, those sources are not subject to any requirements under this rule.

Per **§ 60.48c(a)**, initial notification of the date of construction and actual startup of any new boiler shall be submitted to the Department. **§ 60.48c(g)(3)** states that "the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in **§ 60.42c** to use the fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating fuel delivered to that property during each calendar month.

Per **§ 60.48c(i)**, all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. However, the Department will require these records to be maintained and available for a period of at least five years.

40 CFR Part 60, Subpart Kc, "Standards of Performance for Volatile Organic Liquid Storage (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023" [ADEM Admin. Code r. 335-3-10-.02(9)(c)]

Per **§ 60.110c(a),** this subpart applies to each storage vessel with a capacity greater than or equal to 20,000 gallons that is used to store volatile organic liquids (VOL) for which construction, reconstruction or modification is commenced after October 4, 2023. Per **§ 60.111c**, VOL is defined as any organic liquid which can emit volatile organic compounds (as defined in 40 CFR 51.100) into the atmosphere. All tanks with a capacity greater than 20,000 gallons at the facility storing asphalt are subject to this subpart. This includes the following tanks:

- Flux Asphalt Tank 1 (2,000,000 gallons)
- Flux Asphalt Tank 2 (2,000,000 gallons)

- PG Grade Tank 3 (888,000 gallons)
- PG Grade Tank 4 (888,000 gallons)
- PG Sealant Tank 5 (545,000 gallons)
- Hard Asphalt Tank 6 (545,000 gallons)
- Coating Tank 101 (193,445)
- Coating Tank 102 (193,445)
- MLA/MSA Tank 201 (38,914 gallons)
- MLA/MSA Tank 202 (38,914 gallons)
- Asphalt Day Tank 7 (222,000 gallons)

Per **§ 60.110c(f),** storage vessels that are affected facilities according to **§ 60.110c(a)** and do not meet the requirements of **§ 60.110c(c)(1 or 2) and § 60.110c(d)(1 or 2)** regarding the storage of VOL with a vapor pressure equal to or greater than 0.5 psia or VOL with a vapor pressure equal to or greater than 1.5 psia, respectively, are subject only to the requirements of **§ 60.113c(d),** if applicable, and **§ 60.115c(b).** Since these storage tanks contain asphalt with a vapor pressure of less than 0.5 psia, the facility must determine maximum true vapor pressure according to the requirements of **§ 60.113c(d)** and maintain records according to the requirements of **§ 60.115c(b)**.

40 CFR Part 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture" [ADEM Admin. Code r. 335-3-10-.02(47)]

Applicability

Per **§ 60.470(a-b)**, this subpart applies to each saturator and each mineral handling and storage facility at asphalt roofing plants; and each asphalt storage tank and each blowing still at asphalt processing plants, petroleum refineries, and asphalt roofing plants provided construction commences after November 18, 1980. The following operating units and control devices are subject to this subpart:

- Converter 1 (EPN 2- Direct-Fired TO)
- Converter 2 (EPN 2 - Direct-Fired TO)
- Asphalt Storage Tanks [Tank Fume Fiber Bed Filter & Asphalt Plant RTO (EPN 1)]
- Sealant/Adhesive Applicators [Coating Asphalt Fiber Bed Filter and Roofing Plant RTO (EPN 17)]
- Roofing Sealant/Adhesive Tanks (EPN 17 - Roofing Plant RTO)
- Roofing Plant RTO (EPN 17)
- Sand Storage Silo #1 (EPN 18-Baghouse)
- Sand Storage Silo #2 (EPN 19-Baghouse)
- Filler Storage Silo #1 (EPN 20-Baghouse)
- Filler Storage Silo #2 (EPN 21-Baghouse)
- Filler Storage Silo #3 (EPN 22-Baghouse)
- Granule Unloading (EPN 23-Baghouse)
- Granule Railcar/Truck Unloading (EPN 29 - fugitive)

Emissions Standards

Per **§ 60.472(a)(1)**, particulate matter emissions shall not be discharged from any *saturator* (coater) in excess of 0.08 lbs/ton of asphalt shingles or mineral-surfaced roll roofing produced or 0.8 lbs/ton of saturated felt or smooth-surfaced roll roofing produced. Per **§ 60.472(a)(2)**, no exhaust gases from the saturators shall be discharged with opacity greater than 20 percent. Per **§ 60.472(a)(3)**, no visible emission from a saturator capture system shall be discharged for more than 20 percent of any period of consecutive valid observations totaling 60 minutes.

Per **§ 60.472(b)(3)**, particulate matter emissions shall not be discharged from any *blow still* (converter) in excess of 1.2 lb/ton of asphalt charged to the still during blowing without a catalyst. Per **§ 60.472(b)(5)**, no exhaust gases from the blowing stills shall be discharged with opacity greater than 0 percent.

Per **§ 60.472(c)**, within 60 days of achieving maximum production rate, but not later than 180 days after initial startup, no owner or operator shall cause to be discharged from any *asphalt tank* exhaust gases with an opacity greater than 0 percent, except for one consecutive 15-minute period in any 24-hour period when transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period.

Per **§ 60.472(d)**, within 60 days of achieving the maximum production rate, but not later than 180 days after initial startup, no owner or operator shall cause to be discharged from any *mineral handling and storage facility* emissions with an opacity greater than 1 percent.

Emissions Monitoring and Recordkeeping

Per **§ 60.473(b)**, the owner or operator subject to the provisions of this subpart and using an afterburner to meet the emission limit in § 60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature in the combustion zone of the afterburner. The monitoring instrument shall have an accuracy of ±10 °C (±18 °F) over its range. An afterburner is defined as an exhaust gas incinerator used to control emissions. The RTOs meet this definition; therefore, the RTOs are subject to the continuous temperature monitoring requirement.

Per **§ 60.473(d)**, the owner/operator is required to record and report the operating temperature of the control device during the performance test and, as required by § 60.7(d), maintain a file of the temperature monitoring results for at least two years.

Compliance and Performance Test Methods and Procedures

For saturators [**§ 60.474(a)**], performance tests shall be conducted as follows:

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

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

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

The permit application states that the facility will produce smooth-surfaced rolls, mineral surface rolls, or cut shingles. Therefore, all three of the above performance tests will be required from the Roofing Plant RTO exhaust based on the products produced.

Per **§ 60.474(b)**, the facility must use reference methods located in Appendix A of 40 CFR Part 60 for the performance tests required for the facility.

For the *blowing still and the saturator*, the facility shall determine compliance with the particulate matter standards in accordance with **§ 60.474(c)(1-4)**. The facility has two converters that function as blowstills and a coater which is included in the definition of a saturator.

Per **§ 60.474(c)(5)**, Method 9 and the procedures in § 60.11 shall be used to determine opacity.

For the *saturator* (coater) capture system, compliance with the standard in **§ 60.472(a)(3)** shall be determined by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with § 60.8(c)) totaling 60 minutes. A test shall consist of one run [**§ 60.474(d)**].

40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" [ADEM Admin. Code r. 335-3-10-.02(67)]

Applicability

Per **§60.670(a)(1)**, this subpart is applicable to each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station located at a nonmetallic mineral processing plant. Additionally, per **§60.670(a)(2)**, this subpart **does not** apply to plants without crushers or grinding mills above ground. Although limestone, sand, and granules used in the roofing process meet the definition of a "*nonmetallic mineral*", the facility receives material that is already processed, pneumatically conveys the material to silos/storage, and does not operate a crusher or grinder for processing. Therefore, this subpart is **not** applicable to the Owens Corning plant.

40 CFR Part 60 Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" [ADEM Admin. Code r. 335-3-10-.02(87)]

Applicability

Per **§ 60.4200(a)(2)(i)**, owners and operators of stationary commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006 and are not fire pump engines, are subject to the provisions of this subpart. The proposed engines are not fire pump engines and will be constructed in 2026; therefore, they are subject to this subpart.

Emissions Standards

Per **§ 60.4205(b)**, owners and operators of emergency engines with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in **§ 60.4202.**

Owens Corning plans to operate two emergency engines for electrical generation in the Asphalt Plant and in the Roofing Plant. Both engines are 910 kW engines with a displacement of less than 10 liters per cylinder.

Per **§ 60.4202(a)(2)**, manufacturers must certify their 2007 model year and later emergency engines with a maximum engine power greater than or equal to 37 kW, to the Tier 2 or Tier 3 emissions standards for

new marine CI engines for the same rated power as described in 40 CFR Part 1042, Appendix I, for all pollutants, and the smoke standards as specified in 40 CFR 1039.105 beginning in model year 1007.

For engines with a rated power greater 560 kW, the Tier 2 standards are applicable. Therefore, the emission standards for the Asphalt Plant and Roofing Plant engines are as follows:

- NOx + NMHC: 6.4 g/kW-hr
- CO: 3.5 g/kW-hr
- PM: 0.2 g/kW-hr (filterable)

Per **§ 1039.105**, smoke opacity from the engines may not exceed the following standards:

- 20 percent during the acceleration mode
- 15 percent during the lugging mode
- 50 percent during the peaks in either the acceleration or lugging modes

Per **§ 60.4206**, the facility must operate and maintain the engines that meet the above emission standards over the entire life of the engine.

Per **§ 60.4207(b),** diesel fired engines with a displacement of less than 30 liters per cylinder must use diesel fuel that meets the requirements of 40 CFR 1090.305 for non-road diesel fuel as follows:

- The facility must use Ultra Low Sulfur Diesel
- Maximum sulfur content of 15 ppm
- Minimum cetane index of 40 or maximum aromatic content of 35 volume percent

Emissions Monitoring

Per **§ 60.4209**, the following monitoring requirements for owners or operators must be met:

- The engines shall have a non-resettable hour meter installed;
- If the engines are equipped with a diesel particulate filter, the filter must be equipped with a backpressure monitor that notifies the owner when the high back pressure limit of the engine is approached.

Compliance and Performance Test Methods and Procedures

Owners and operators must comply with the emissions standards as specified in **§ 60.4211(a)** as follows:

- Operate and maintain the engines according to the manufacturer's emissions-related written instructions
- Change only emissions-related settings as allowed by the manufacturer
- Meet the requirements of 40 CFR Part 1068 as they apply.

Per **§ 60.4211(c),** owners and operators of 2007 model year of later stational CI internal combustion engines, which are required to meet the emissions standards of **§ 60.4205(b), and subsequently § 60.4202,**

must demonstrate compliance by purchasing an engine certified to the meet the emissions standards for the same model year and engine power. In addition, the engine must be installed and configured according to the manufacturer's emission-related

Per **§ 60.4211(f),** emergency engines must be operated according to the requirements of paragraphs (f)(1) through (f)(3) as follows:

- There is no time limit on the use of emergency engines in emergency situations.
- Emergency engines may be operated for a maximum of 100 hours per year for maintenance checks and readiness testing according to the manufacturer's instructions.
- Operations are limited to 50 hours per year for operating in non-emergency situations. The 50 hours cannot be used for peak shaving or non-emergency demand response or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except for the reasons listed in **§ 60.4211(f)(3)(i)(A) through (i)(E).**

Per **§ 60.4211(g),** if the facility does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the facility changes emission-related settings in a way that is not permitted by the manufacturer, the engine must demonstrate compliance in accordance with the requirements of a stationary CI internal combustion engine, including compliance testing, as listed in **§ 60.4211(g)(1) through (g)(3).**

Recordkeeping and Reporting Requirements

Per **§ 60.4214(b)**, emergency engines are not required to submit an initial notification. In addition, the facility must keep records of the hours of operation in emergency and non-emergency service, if the engine does not meet the standards applicable to non-emergency engines. Therefore, the facility will be required to keep records of the hours of operation in both emergency and non-emergency service.

Per **§ 60.4214(c),** if a stationary CI internal combustion engine is equipped with a diesel particulate filter, the facility must keep records of corrective action taken for each notification that the high backpressure limit has been approached or exceeded.

40 CFR Part 63, "National Emission Standards for Hazardous Air Pollutants (NESHAP)" [ADEM Admin. Code r. 335-3-11-.06]

Owens Corning would be an **area source for HAPs** since the facility does not emit greater than 10 TPY for a single HAP or 25 TPY for a combination of HAPs. The facility is subject to the NESHAP requirements as discussed below.

40 CFR Part 63, Subpart A, "General Requirements" [ADEM Admin. Code r. 335-3-11-.06(1)]

This subpart is applicable provided that the facility is subject to one of the applicable subparts found under 40 CFR Part 63. Table 5 of Subpart AAAAAAA identifies the applicable General Provisions [**§ 63.11565**].

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"

This regulation is applicable since the proposed sources are new or reconstructed emergency stationary reciprocating internal combustion engines (RICE) located at an area source of HAP. However, in according to **§ 63.6590(c)**, stationary engines that comply with the requirements of 40 CFR Part 60, Subpart IIII are not subject to additional requirements under the RICE MACT.

40 CFR Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" [ADEM Admin. Code r. 335-3-11-.06(107)]

Per **§ 63.7485**, a facility is subject to this subpart if they own or operate an industrial, commercial, or institutional boiler or process heater that is located at a major source of HAPs. Since Owens Corning is an area source of HAPs, the facility is **not** subject to Subpart DDDDD.

40 CFR Part 63, Subpart LLLLL – National Emission Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing" [ADEM Admin. Code r. 335-3-11-.06(115)]

Per **§ 63.8681(a)**, this subpart applies to blowing stills, asphalt storage tanks, saturators, wet loopers, and coaters at a major source of HAPs. Since the facility is an area source of HAP, it is **not** subject to Subpart LLLLL.

40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Surface coating at the facility is completed by rolling paint onto shingles. According to the Safety Data Sheets (SDSs) for the paint used, there are no HAPs contained in any of the products used for painting. In addition, this coating activity does not meet any of the operations listed in **§ 63.11169**, nor is the facility a tribal, local, State or Federal facility performing the activities described in **§ 63.11170**. Therefore, the Owens Corning facility is **not** subject to this regulation.

40 CFR Part 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources"

This subpart is applicable to industrial, commercial, and institutional boilers located at area sources. Owens Corning would be subject to this subpart. However, since the boilers are natural gas-fired, they are **exempt** from the requirements per **§ 63.11195(e)**.

40 CFR Part 63, Subpart AAAAAAA—National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing [ADEM Admin. Code r. 335-3-11-.06(156)]

Applicability

Per **§ 63.11559**, asphalt processing operations and/or asphalt roofing manufacturing operations at an area source of HAP emissions are subject to this subpart. Asphalt processing includes all blowing stills, and asphalt roofing manufacturing includes the collection of all asphalt coating equipment. The Owens Corning

plant includes both asphalt processing and asphalt roofing manufacturing. Therefore, this facility **is subject** to Subpart AAAAAAA.

Emissions Standards

Asphalt Plant

The facility must meet the emission limits specified in **Table 1** of Subpart AAAAAAA per **§ 63.11561(a)**. Emissions standards for the asphalt facility are as follows:

1. Asphalt Converter 1 and Asphalt Converter 2 (Blowing Stills) – limit poly-aromatic hydrocarbon (PAH) emissions to 0.003 lb/ton of asphalt charged to the converter **or** limit PM emissions to 1.2 lb/ton of asphalt charged to the converter.

Roofing Plant

The roofing line must meet the emission limits specified in **Table 2** of Subpart AAAAAAA per **§ 63.11561(b)**. Emissions standards for the roofing facility are as follows:

1. Coaters – limit PAH emissions to 0.0002 lb/ton of roofing product (i.e. smooth-surfaced rolls, mineral surface rolls, or shingles) manufactured **or** limit PM emissions to 0.06 lb/ton of asphalt roofing product manufactured.

Per **§ 63.11561(c)**, these standards apply at all times.

Compliance and Performance Test Methods and Procedures

Asphalt Plant

Per **§ 63.11562(a)(1)**, asphalt processing operations must demonstrate initial compliance with the emission limits in Table 1 to this subpart by conducting emissions tests using the methods in **Table 3** of this subpart within 180 days of startup.

Per **§ 63.11562(a)(2)**, the operating parameter specified in **Table 4** of this subpart must be established by using the data recorded during the compliance test. Per Table 4, the facility will be required to establish a minimum combustion zone temperature (based on a 3-hour average) since these processes will be controlled by a thermal oxidizer. The 3-hour averaging period applies at all times other than startup and shutdown, as defined in § 63.2. Within 24 hours of a startup event, or 24 hours prior to a shutdown event, the facility must normalize the emissions that occur during the startup or shutdown, when there is no production rate available to assess compliance with the lb/ton of product emission limits, with emissions that occur when the process is operational. The emissions that occur during the startup or shutdown event must be included with the process emissions when assessing compliance with the emission limits specified in Table 1.

Roofing Plant

Per **§ 63.11562(b)(1)**, asphalt roofing manufacturing lines must demonstrate initial compliance with the emission limits in Table 1 to this subpart by conducting emissions tests using the methods in **Table 3** of this subpart within 180 days of startup.

Per § 63.11562(b)(2), the operating parameter specified in **Table 4** of this subpart must be established by using the data recorded during the compliance test. Per Table 4, the facility will be required to establish a minimum combustion zone temperature (based on a 3-hour average) since these processes will be controlled by a thermal oxidizer. The 3-hour averaging period applies at all times other than startup and shutdown, as defined in § 63.2. Within 24 hours of a startup event, or 24 hours prior to a shutdown event, the facility must normalize the emissions that occur during the startup or shutdown, when there is no production rate available to assess compliance with the lb/ton of product emission limits, with emissions that occur when the process is operational. The emissions that occur during the startup or shutdown event must be included with the process emissions when assessing compliance with the emission limits specified in Table 1.

If demonstrating initial compliance with the emissions limits in **Tables 1 and 2** of this subpart, the following must be followed for both the asphalt and roofing plants [**§ 63.11562(i)(1) through (i)(4)**]:

1. Conduct compliance tests while manufacturing the product that generates the greatest PAH and PM emissions to the control device inlet per in **§ 63.11562(i)(1).**
2. Conduct at least three separate runs for each compliance test [**§ 63.11562(i)(2)**]
   (i) For asphalt processing: the sample time and volume for each test must be at least 90 minutes or the duration of the coating blow or non-coating blow, whichever is greater, and 79.4 dscf..
   (ii) For roofing coater: the sampling time and volume for each test run must be at least 120 minutes and 106 dscf.
3. To calculate the charging rate to the converters for the compliance test, the equations shown in **§ 63.11562(i)(3)** must be used.
4. For demonstration of emissions of the roofing line, the equation shown in **§ 63.11562(i)(4)** must be used.

Emissions Monitoring

Operating parameters established during performance testing must be maintained during operation of the asphalt processing and roofing plants per **§ 63.11563(a)**.

If a control device is being used for compliance with emission limits of Tables 1 and 2, a site-specific monitoring plan (SSMP) must be developed for each monitoring system and must include the requirements in **§ 63.11563(b)(1) through (b)(3)**.

If a control device is being used for compliance with emission limits of Tables 1 and 2, the facility must install, operate, and maintain a continuous parameter monitoring system (CPMS) as specified in **§ 63.11563(c)(1) through (c)(3)**.

For each temperature monitoring device, the facility must meet the CPMS requirements of **§ 63.11563(d)(1) through (d)(6)**.

Per **§ 63.11563(i)**, at all times the facility must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Per **§ 63.11563(j) and (k)**, the facility must conduct a performance evaluation of each CPMS and must operate and maintain the CPMS in accordance with the SSMP.

Recordkeeping and Reporting Requirements

The Permittee must submit the applicable notifications in **§ 63.11564(a)(1)**.

Per **§ 63.11564(a)(3)**, the facility must submit initial notifications not later than 120 days after the sources become subject to Subpart AAAAAAA.

Per **§ 63.11564(a)(4)**, notification of intent to conduct a compliance test must be submitted at least 60 days before the date that the test is scheduled to begin.

Per **§ 63.11564(a)(5)**, the facility must submit a Notification of Compliance Status according to **§ 63.9(h)(2)(ii)** prior to close of business on the 60th calendar day following the completion of the compliance test(s).

Per the requirements of **§ 63.11564(b)(4)**, Owens Corning must submit a semiannual compliance report for the reporting periods of January 1 through June 30 and July 1 through December 31. The reports are due no later than July 31 or January 31. The first report must be submitted for the remainder of first calendar half following the compliance test date. All reports should include the requirements specified in **§ 63.11563(b)(2)**; for periods where there are deviation(s), the report should include the additional requirements specified in **§ 63.11564(b)(3)**.

Per the requirements specified in **§ 63.11564(c)**, records must be maintained as specified below:

1. Copies of each notification and report submitted to comply with this subpart [**§ 63.11564(c)(1)**]
2. Copies of emission tests used to demonstrate compliance [**§ 63.11564(c)(2)**]
3. Documentation identifying the operating parameters and values as specified in Table 4 of this subpart and procedures to establish operating parameters. [**§ 63.11564(c)(4)**]
4. A copy of the site-specific monitoring plan [**§ 63.11564(c)(8)**]
5. Records that show continuous compliance with the operating parameters required in Table 4 of this subpart. [**§ 63.11564(c)(10)**]

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

Per **§ 64.2(a)**, this subpart applies to a pollutant-specific emissions unit at a major source under Part 70 or 71 that satisfies all of the following criteria for a pollutant to be subject to CAM:

1. An emissions limit or standard for the applicable regulated air pollutant, except for exemptions provided in **§ 64.2(b)**,

2. The unit uses a control device to achieve compliance with the emission limit for the applicable regulated air pollutant, and
3. The unit has potential uncontrolled emissions of a regulated air pollutant that is equal to or above 100% of the amount in tons per year required to be a major source. The major source threshold values for the facility are shown in Table 1 of this analysis.

Owens Corning is required to obtain a permit under Part 70, State Operating Permit Programs (Title V). In accordance with subpart 64, an emissions source as defined in Part 70 is any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under section 112(b) of the Clean Air Act. Note that this regulation is applicable to individual operating units (standalone). Although collectively some units exceed a major source threshold for a regulated air pollutant, individually the units do not exceed any major source threshold as required by **§ 64.2(a)(3)**. Therefore, at this time CAM is not required.

The facility will be required to address CAM requirements, if applicable, in the initial Title V application within one year of start-up of the plant.

RECOMMENDATIONS

Based on an inspection of the proposed construction site and after the conclusion of a 15-day public comment period, I recommend that Owens Corning be issued Air Permits for the new asphalt processing and roofing manufacturing plant located in Prattville, AL. If the facility adheres to the permit conditions, it should be in compliance with all State and Federal Air Pollution Regulations. Owens Corning should submit a Title V application within one year of startup.

Permit Number	Description
201-0018-X001	**Asphalt Plant Oxidation Process** Direct Fired Thermal Oxidizer (TO) (EPN 2) Asphalt Converters 1 and 2 Knock Out Tanks 1 and 2 Asphalt Preheater Polymer Handling (Fugitive – EPN 9)
201-0018-X002	**Roofing Line Process** Roofing Regenerative Thermal Oxidizer (TO) (EPN 17) • Asphalt Coater • Asphalt Filler Mixer • Sealant/Adhesive Applicators Roofing Line Roof Vent (EPN 16)

- Cooling Section

Hot Filler System with Baghouse (EPN 25)

Finishing Layer application System (Fugitive – EPN 30)

201-0018-X003

Tank Storage and Loading/Unloading

Asphalt Plant:

- Asphalt Plant Regenerative Thermal Oxidizer (EPN 1)
  - Asphalt Storage Tanks 1, 2, 3, 4, 5, 6, 7, 101, 102, 201, 202, and Wetting Tank (Subparts Kc and UU
  - BD Oil Tank 501
  - Loading/Unloading Racks LR 1 and LR 2 (EPN 6)
  - Asphalt Fiber Bed Filter (EPN 7)

Roofing Plant:

- Roofing Plant Regenerative Thermal Oxidizer (EPN 17)
  - Sealant/Adhesive Storage Tanks 1 and 2 (Subpart UU)
  - Sealant/Adhesive Use Tanks 1 and 2 (Subpart UU)
  - Sealant/Adhesive Mix Tank (Subpart UU)
  - Coating Surge Tank (Subpart UU)
  - Roofing Diesel Tank
  - Modifier Oil Tank
  - Trackmobile Diesel Tank
  - Coating Fiber Bed Filter

201-0018-X004

Material Loading/Surfacing Production Areas:

- Sand Silos #1 and #2 with Baghouses (EPN 18 & 19)
- Filler Storage Silos #1, #2 and #3 with Baghouses (EPN 20, 21 & 22)
- Granule Unloading/Storage with Baghouses (EPN 23 & 24)
- Sand Use Bin with Baghouse (EPN 26)
- Prime Granule Use Bin with Baghouse (EPN 27)
- Headlap Granule Use Bin with Baghouse (EPN 28)
- Roofing Production Building Baghouse (EPN 31)
- Granule/Sand Dryer/Separator with Baghouse (EPN 36)
- Granule Railcar/Truck Unloading Conveyor (EPN 29)
- Fugitive emissions (EPN 6 & EPN 16)

201-0018-X005	**Heaters/Boilers – Natural Gas Fired** 35.0 MMBtu/hr Asphalt Preheater controlled by the Direct Fired Thermal Oxidizer (EPN 2) 21.0 MMBtu/hr Asphalt Boilers (EPN 3 & 4) 10.0 MMBtu/hr Asphalt Tanks Hot Oil Heater (EPN 5) 50.0 MMBtu/hr Facility Heater (EPN 11) MMBtu/hr Front End & Back End Hot Oil Heaters (EPN 12 & 14) 9.0 MMBtu/hr Filler Hot Oil Heater and Coating Preheater (EPN 13 & 15) 2.0 MMBtu/hr Surface Reclaim Heater (EPN 37)
201-0018-X006	One (1) 910 kW (1,220 bhp) Diesel Fired Emergency Generator located at the Asphalt Plant (EPN 10) One (1) 910 kW (1,220 bhp) Diesel Fired Emergency Generator located at the Roofing Plant (EPN 32)

Chrystal Strickland

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Energy Branch
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ADEM

March 2026
Date