

STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0310050-043-AV

APPLICANT

The applicant for this project is Owens Corning Roofing and Asphalt, LLC. The applicant's responsible official and mailing address are: Ms. Hana Lane, Site Leader, Owens Corning Roofing and Asphalt, LLC, Jacksonville Plant, 1035 Talleyrand Avenue Jacksonville, Florida 32206.

FACILITY DESCRIPTION

The applicant operates the existing Jacksonville Plant, which is located in Duval County at 1035 Talleyrand Avenue, Jacksonville, Florida.

The Jacksonville Plant manufactures asphalt and roofing products, including asphalt shingles. The plant manufactures several types of asphalts with various characteristics. Regulated emission units include material handling operations, a mineral application area (surfacing area), an asphalt coater system, asphalt convertors (blowing stills), asphalt and asphalt products storage tanks, and asphalt loading equipment. The facility uses add-on control devices that include a fume incinerator, a fiber fed filter(s), and dust collectors.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Bulk Limestone Storage Silo No. 1
002	Limestone Transfer System (Upper Surge Hopper)
003	Limestone Filler Heater
004	Bulk Limestone Storage Silo No. 2
012	Asphalt Blowing Still Nos. 1 and 2
015	Asphalt Storage Tank Nos. 15 and 47
018	Asphalt Storage Tank Nos. 48 and 49
019	Tank Truck Loading Rack Nos. 1 and 2
021	Adhesive Tank
028	Mineral Application System (Surfacing Area)
029	Bulk Granule Handling System
030	Shingle Laminator System
031	Adhesive Tank (MLA)
034	Asphalt Coater System No. 2
037	Steam Generator
038	Coating Tank No. 1
039	Asphalt Storage Tank No. 42
040	Asphalt Storage Tank No. 46
043	Sealant Storage Tank Nos. 44 and 45
045	Sand System
046	Spray Application System
047	Emergency Stationary RICE
048	Asphalt Storage Tank No. 8
049	Asphalt Storage Tank Nos. 9 and 10, 11 and 50
050	Surface Reclaim System
<i>Unregulated Emissions Units and Activities</i> (see Appendix U, List of Unregulated Emissions Units and/or Activities)	
013	Material Handling System
014	Heaters
017	Uncontrolled Asphalt Storage Tank Nos. 1, 2, 3, 6, 7, 11, 12, 13, 23, 24, 25, 26, 27, 28 and 29

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022	Cooling Section
023	Miscellaneous Fugitive Emission Operations
026	Pouring Shed
027	Road Dust
041	Rubber Material (supersack) unloading hopper and conveyor

APPLICABLE REGULATIONS

Based on the Title V air operation permit revision application received on January 27, 2025, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is not a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	001, 004, 012, 015, 021, 030, 031, 034, 038, 039, 040, 043, 047, 048, <u>Asphalt Storage Tank No. 50, EU</u> 049, 050
<u>40 CFR 60, Subpart Kc, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023</u>	<u>(Asphalt Storage Tank No. 50, EU 049)</u>
40 CFR 60, Subpart UU, Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture	001, 004, 012, 015, 021, 030, 031, 034, 038, 039, 040, 043, 048, <u>Asphalt Storage Tank No. 50, EU</u> 049
40 CFR 60, Subpart UUU, Standards of Performance for Calciners and Dryers in Mineral Industries	050
40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	047
40 CFR 60, Subpart A, NESHAP General Provisions	012, 034
40 CFR 63, Subpart AAAAAAA, National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing	012, 034
40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	047
40 CFR 64, Compliance Assurance Monitoring	028, 029
<i>State Rule Citations</i>	
Rule 62-4, F.A.C., Permits	001-004, 012, 015, 019, 028-029, 037-040, 043, 045-047, 048, 049, 050
Rule 62-204.800, F.A.C., Federal Regulations Adopted by Reference	001-004, 012, 015, 019, 021, 028-031, 034, 037-040, 043-047, 048, <u>Asphalt Storage Tank No. 50, EU</u> 049, 050
Rule 62-210.200, F.A.C., PTE	001-004, 012, 015, 018-019, 021, 028-031, 034, 037-040, 043, 045-046, 048, 049, 050
Rule 62-210.370, F.A.C., Emissions Computation and Reporting	046
Rule 62-210.650, F.A.C., Circumvention	012, <u>049</u>
Rule 62-213.440, F.A.C., Permit Content	001-004, 012, 015, 019, 021, 028-031, 034, 038-040, 043-045, 047, 048, 049, 050
Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators < 250 MMBtu/hr	037
Rule 62-296.700, F.A.C., RACT Particulate Matter	002-003, 028-029, 045
Rule 62-296.711, F.A.C., Material Handling, Sizing, Screening, ...	002-003, 028-029, 045
Rule 62-297.310, F.A.C., General Emissions Test Requirements	001-004, 012, 015, 019, 021, 028-031,

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	034, 037-040, 043, 045-046, 048, 049, 050
Rule 62-297.620, F.A.C., Exceptions and Approval of Alternate Procedures.	003, 045

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above mentioned facility. This project incorporates the terms and conditions of Permit No. 0310050-038-AC which authorized the construction of new asphalt storage tank (Asphalt Storage Tank No. 50) to replace the existing Controlled Asphalt Storage Tank No. 10 at EU049. The emissions from Asphalt Storage Tank No. 50 were to be routed to the existing CECO fiber bed filter mist eliminator CD017 for control. This air construction permit also authorized the connection of Uncontrolled Asphalt Storage Tank No. 11 (previously under EU017) to the existing CECO fiber bed filter mist eliminator CD017 for control.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit Renewal No. 0310050-037-AV issued **November 14, 2023**

Application for a Title V Air Operation Permit Revision received **January 27, 2025**

Additional information received **February 13, 2025**

Comments from Applicant received **March 3, 2025**

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 2952 – Asphalt Felts and Coatings.

North American Industry Classification System (NAICS): 324122 – Asphalt Shingle and Coating Materials Manufacturing.

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to emissions units (EUs) 028 and 029. EU 028 is a mineral application system. EU 029 is a bulk granule handling system. CAM applies as EUs 028 and 029 operate separate dust collectors to control emissions of particulates below the Title V major source threshold.

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

PROJECT REVIEW

Changes to the permit made as part of this revision are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been **highlighted in yellow** within the permit document.

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1. The terms and conditions of Permit No. 0310050-038-AC are incorporated into Subsection G of the Title V permit as follows:

Subsection G. The specific conditions in this section apply to the following emission units:

EU No.	Brief Description
019	Tank Truck Loading Rack Nos. 1 and 2
049	Asphalt Storage Tank Nos. 9 and 10 , 11 and 50

The Tank Truck Loading Rack Nos. 1 and 2, ~~EU 019, was formerly an unregulated emission unit.~~ PM emissions are controlled by a fiber bed filter.

The Asphalt Storage Tank Nos. 9 ~~and 10~~, 11 and 50, ~~EU 049, was formerly part of unregulated EU 017—Uncontrolled Asphalt Storage Tanks.~~ Asphalt Storage Tank No. 50 is approximately 25 feet in diameter, 32 feet in height, with a storage capacity of 101,891 gallons. The asphalt stored in Asphalt Storage Tank No. 50 has a true vapor pressure less than 3.5 kilopascal (kPa). PM emissions from each asphalt storage tank are controlled by a CECO acid fiber bed filter mist eliminator CD017.

{Permitting Note: Each emission unit has monitoring and recordkeeping requirements for the purpose of providing PTE enforceability as a practical matter of the 95% particulate matter control efficiency used for the acid mist eliminators used in the PTE PM emissions rate.}

{Permitting Note: Asphalt Storage Tank No. 50 of EU 049 is regulated under 40 CFR 60, Subpart UU, Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture; 40 CFR 60 Subpart Kc- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023; 40 CFR 60, Subpart A - General Provisions; and Rule 62.800(8)(b), F.A.C.}

Essential PTE Parameters

G.1. Permitted Capacity- EU 019. The Tank Truck Loading Rack (Nos. 1 and 2) maximum permitted loading rate is 100,000 tons of paving asphalt and 206,826 tons of oxidized asphalt per rolling 12-month period. [Rule 62-4.070(3), F.A.C.; Permit No. 0310050-029-AC; and Rule 2.1401, JEPB]

G.2. Hours of Operation- EU 019 and 049. Each emission unit may operate continuously without restriction. [Rule 62-210.200(PTE), F.A.C.; and Rule 2.301, JEPB; and Permit No. 0310050-038-AC]

Control Technology

G.3. CECO Fiber Bed Filter Mist Eliminator CD017. The permittee shall operate and maintain the CECO fiber bed filter mist eliminator CD017 to control emission of PM₁₀ from Asphalt Storage Tank Nos. 11 and 50. The CECO fiber bed filter mist eliminator shall have a 95% control efficiency for reducing PM₁₀ emissions. [Rules 62-4.070 & 62-210.200(PTE), F.A.C.; 2.301, 2.1401, JEPB; and Permit No. 0310050-038-AC]

G.4. Circumvention. The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.; and 2.301, JEPB]

G.5. Maintain and Operate Pollution Control Equipment: At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and

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inspection of the source. [Rule 62-204.800(8), F.A.C.; 2.201, JEPB; 40 CFR 60.11(d) and Permit No. 0310050-038-AC]

Emission Limitations and Standards

Unless otherwise specified, the averaging times for **Specific Conditions G.3, G.6 and G.8. below** are based on the specified averaging time of the applicable test method.

G.6. Visible Emissions- EU 019, Asphalt Storage Tank No. 9 (EU 049). Visible emissions shall not exceed 20 percent opacity from each emissions unit 019 and Asphalt Storage Tank No. 9. [Rule 62-4.070(3), F.A.C.; Permit No. 0310050-029-AC; and Rule 2.1401, JEPB]

G.7. Visible Emissions- Asphalt Storage Tank No. 11 (EU 049). Visible emissions shall not be equal to or exceed 20 percent opacity. [Rule 62-296.320(4)(b), F.A.C.; Rule 2.1401, JEPB; Permit No. 0310050-038-AC]

G.8. Visible Emissions- Asphalt Storage Tank No. 50 (EU 049). As determined by stack test, visible emissions shall not exceed 0% opacity, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The CECO fiber bed filter mist eliminator CD017 control device shall not be bypassed during this 15-minute period. [Rule 62-204.800(8)(b), F.A.C.; 2.201, JEPB; and 40 CFR 60.472(c); and Permit No. 0310050-038-AC]

G.9. Opacity Standard- Asphalt Storage Tank No. 50 (EU 049). The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [Rule 62-204.800(8)(b), F.A.C.; 2.201, JEPB; and 40 CFR 60.11(c)]

Test Methods and Procedures

G.10. Test Methods. When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A-4, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, F.A.C., Rule 2.201, JEPB; 40 CFR 60.474(b) & (c)(5), and Appendix A of 40 CFR 60]

G.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix D, Common Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C., and Rule 2.1201, JEPB]

{Permitting Note: Air compliance test notifications can now be completed online in the Department's Business Portal. To access this online process, go to <http://www.fldepportal.com/go/home> and sign in (or register if you're a new user) from the link in the upper right corner of the page. On the Welcome page select the Submit option, then select Registration/Notification, and then click on Air Compliance Test Notifications. Once in the process, just carefully read the instructions on each screen (and under the Help tabs) to complete the notification.}

G.12. Annual Compliance Tests Required- EU 019, Asphalt Storage Tank No. 9, Asphalt Storage Tank No. 50 (EU 049). During each calendar year (January 1st to December 31st), each EU (and emission source) shall be tested while operating to demonstrate compliance with the emissions standards for VE listed in **Specific Conditions G.3, G.6 and G.8. above**. VE testing for Asphalt Storage Tank No. 9 shall be conducted for a minimum period of 30 minutes. VE testing for Asphalt Storage Tank No. 50 shall be conducted for a minimum period of 60 minutes [Rules 62-297.310(5)(b) & 62-297.310(8), F.A.C.; Rule 2.1201, JEPB; Permit No. 0310050-029-AC and Permit No. 0310050-038-AC]

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Monitoring of Operations

- G.14. Control Device-Pressure Drop.** The pressure drop across each control device shall be measured each day of operation.
- If the pressure drop is less than the manufacturer's specifications for the minimum pressure drop, the permittee shall investigate the cause. The control device shall be inspected including the filters for damage or for loose or missing filters. Each investigating event shall be logged including any corrective actions taken
 - If the pressure drop exceeds the manufacturer's specifications for the maximum pressure drop, the permittee shall promptly investigate the cause, document the problem, and develop and implement an action plan that returns the system within 24-hours to a normal pressure drop operating range.
- [Rule 62-4.070(3), F.A.C.; Permit 0310050-029-AC; and Rule 2.1401, JEPB]

G.15. Control Device -Operating Temperature-Asphalt Storage Tank No. 50 (EU 049). The permittee shall record and report the operating temperature at the inlet of the control device during the performance test and as required by 40 CFR 60.7(d), maintain a file of the temperature monitoring results for at least 5 years. [40 CFR 60.473(d); Rule 62-204.800(8)(b), F.A.C.; and 2.201, JEPB; Permit No. 0310050-038-AC]

Recordkeeping and Reporting Requirements

- G.16. Tank Truck Loading Rack, Loading Records- EU 019.** The permittee shall keep records of the material loaded using the Tank Truck Loading Rack Nos. 1 and 2 (EU 019) for at least five years. The Permittee shall maintain running 12-month rolling totals of each material (paving asphalt and oxidized asphalt) loaded for demonstrating compliance with **Specific Condition G.1. above**. [Rules 62-4.070 & 62-213.440(1)(b), F.A.C.; and Rules 2.1401 & 2.501, JEPB]
- G.17. Monitoring Records.** The permittee shall keep records of the VE compliance test results of **Specific Condition G.6. G.12. above** and the control device monitoring records of **Specific Condition G.7. G.14. above** and also record the manufacture specified minimum and maximum accepted pressure drops by control device for at least five years. [Rule 62-213.440(1)(b), F.A.C.; and Rule 2.501, JEPB]
2. The applicable requirements of 40 CFR 60 Subpart Kc- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 have been added to Subsection G of the Title V permit for EU 049, Asphalt Storage Tank No. 50 as follows:

- G.13. Requirements for determining maximum true vapor pressure, Asphalt Storage Tank No. 50 (EU 049).** The permittee shall determine the maximum true vapor pressure of the stored volatile organic liquid (VOL) according to the requirements specified in **this Specific Condition**. For storage vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For storage vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
- Prior to the initial filling of the storage vessel or to the refilling of the storage vessel with a new VOL, the highest maximum true vapor pressure for the range of anticipated liquids to be stored, including mixtures for which the permittee can define the range of concentrations for constituents in the mixture or with a known maximum Reid vapor pressure, shall be determined using any one of the methods described in **paragraphs a. through d. of this Specific Condition**.
- As obtained from standard reference texts.
 - ASTM D6377-20 (incorporated by reference; see 40 CFR 60.17). Perform the method using a vapor-to-liquid ratio of 4:1, which is expressed in the method as VPCR.
 - ASTM D6378-22 (incorporated by reference; see 40 CFR 60.17). Perform the method using a vapor-to-liquid ratio of 4:1.
 - As measured by an appropriate method as approved by the EPA.

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[Rule 62-204.800(8)(b), F.A.C.; 2.201, JEPB; and 40 CFR 60.110c(a), (f).40 CFR 60.113c(d)(1), 40 CFR 60.117c(b)]

G.18. Records- Asphalt Storage Tank No. 50 (EU 049). The permittee shall keep readily accessible records for the life of Asphalt Storage Tank No. 50 that show the dimension of the storage vessel and an analysis that shows the capacity of the storage vessel.

[Rule 62-204.800(8)(b), F.A.C.; 2.201, JEPB; and 40 CFR 60.115c(b)]

3. Appendix U of the Title V Permit is revised as follows:

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<u>EU No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
013	Mineral Handling System
014	Heaters
017	Uncontrolled Asphalt Storage Tank Nos. 1, 2, 3, 4, 6, 7, 11 , 12, 13, 23, 24, 25, 26, 27, 28, and 29
022	Cooling Section
023	Miscellaneous Fugitive Emission Operations
026	Pouring Shed
027	Road Dust
041	Rubber Material (superstack) unloading hopper and conveyor

CONCLUSION

This project revises Title V air operation Permit No. 0310050-037-AV, which was effective on November 14, 2023. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.