

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0747-AOP-R4 AFIN: 66-00294

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Owens Corning Composite Materials, LLC
5520 Planters Road
Fort Smith, Arkansas 72916

3. PERMIT WRITER:

Jude Jean-Francois

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Nonwoven Fabric Mills
NAICS Code: 313230

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
5/22/2014	Title V Renewal	SN-10 through SN-18 to be removed from permit as well as Specific Condition SC-41 through SC-71 and SC-36.

6. REVIEWER'S NOTES:

Owens Corning owns and operates a fiberglass mat manufacturing facility at 5520 Planters Road in Fort Smith, Arkansas 72916. The facility uses chopped fiberglass and a chemical binder to produce fiberglass mat primarily for use in the roofing products industry. With this Title V Renewal, the facility requested emission sources SN-10 through SN-18 to be removed from the permit as well as Specific Conditions SC-41 through SC-71 and SC-36. The Coated Veil production line permitted in 2008 was never installed. The permitted emission changes include - 7.4 tpy of PM/PM10, -0.2 tpy of SO2, -11.3 tpy of NO_x, -9.5 tpy of CO, -3.0 tpy of VOC, and 1.7 tpy of Ammonia.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

This facility was inspected on February 20, 2014 and was found to be in compliance.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes, explain why this permit modification is not PSD. N/A

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01	VOC Acrylic Acid Formaldehyde Methanol	40 CFR Part 63, Subpart HHHH

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS.

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

Other Modeling: N/A

Odor:

H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards Y/N
 If exempt, explain: _____

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H ₂ S	20 parts per million (5-minute average*)	N/A	N/A
	80 parts per billion (8-hour average) residential area	N/A	N/A
	100 parts per billion (8-hour average) nonresidential area	N/A	N/A

*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C_p = 5-minute average concentration

C_m = 1-hour average concentration

t_m = 60 minutes

t_p = 5 minutes

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-07	Testing	Various	Thermal Oxidizer at SN-01	96%	
08	N/A	5,400 ft ³ /min 0.02 grains/ft ³	N/A	N/A	Emission Factor based on large size of material transferred to this source

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
03-05, & 07	All	Various	Once every 5 years	Verify emission rates used in permit.

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
01	Temperature of Oxidizer	Continuous recorder	15-min 3 hour	No

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	VOC and HAP Usage	Various	Monthly	No

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	20%	Regulation 19, §19.503	Daily Observation
03, 04	5%	Regulation 18, §18.501	Weekly Observation
08	20%	Regulation 18, §18.501	Daily Observation

17. DELETED CONDITIONS:

Former SC	Justification for removal
SC-41 through SC-71	The Coated Veil production line permitted in 2008 was never installed.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Storage Tank (B1-B6)	13			0.040			0.04	0.04
Small Cooling Tower	13	2.0						
Wastewater Treatment Plant	13			0.001			0.001	0.001
Comfort Heaters	13							
Water Heaters (non-process)	13							
Laboratory Equipment	13							
Diesel Tank (55 gal) (mower & tractor fuel)	13							
Empty Silo B7	13							
Ammonia Storage Tote	13							
Ferric Chloride Storage Tank	13							
Lime Silo W4	13							
Lime Slurry Mix Tank W5	13							
Polymer Storage Tank W17	13							
Soda Ash Bin W18	13							

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0747-AOP-R3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-25-14

Facility Name: Owens Corning composite Materials, LLC
 Permit Number: 0747-AOP-R4
 AFIN: 66-00294

\$/ton factor	23.89	Annual Chargeable Emissions (tpy)	255.04
Permit Type	Renewal No Changes	Permit Fee \$	0

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	-19.94
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		46.6	39.2	-7.4		
PM ₁₀		46.6	39.2	-7.4	-7.4	39.2
SO ₂		4.6	4.4	-0.2	-0.2	4.4
VOC		138.8	136.1	-2.7	-2.7	136.1
CO		228.5	219	-9.5		
NO _x		55.1	43.8	-11.3	-11.3	43.8
Acrylic Acid	<input type="checkbox"/>	12.27	17.96	5.69		
Formaldehyde	<input type="checkbox"/>	29.79	22.78	-7.01		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Methanol	<input type="checkbox"/>	20.15	28.91	8.76		
Styrene	<input type="checkbox"/>	6.58	2.2	-4.38		
Triethylamine	<input type="checkbox"/>	2.2	2.2	0		
Ammonia	<input checked="" type="checkbox"/>	29.88	31.54	1.66	1.66	31.54