

Facility Name: **Owens Corning Roofing and Asphalt, LLC - Atlanta Plant**
City: Atlanta
County: Fulton
AIRS #: 04-13-121-00334

Application #: TV-589497
Date Application Received: August 2, 2021
Permit No: 2952-121-0334-V-05-0

Program	Review Engineers	Review Managers
SSPP	Mohamed Abdalla	Hamid Yavari
ISMU	Anna Gray	Dan McCain
SSCP	Taylor Crocker	Tammy Martiny
Toxics	n/a	n/a
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Owens Corning Roofing and Asphalt, LLC - Atlanta Plant.

2. Parent/Holding Company Name

Owens Corning, LLC.

3. Previous and/or Other Name(s)

This plant consists of two sections: an asphalt roofing manufacturing division and an asphalt processing and storage division (Trumbull Asphalt Operations). The latter, previously known as "Trumbull," used to be a separate operation and was bought by Owens Corning.

4. Facility Location

4795 Frederick Drive
Atlanta, Georgia 30336

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in the Atlanta non-attainment area.

B. Site Determination

There are no other manufacturing facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2952-121-0334-V-04-0	February 2, 2017	Title V renewal.
2952-121-0334-V-04-1	Pending ?????	Title V minor modification issued for the construction and operation of a new Thermal Oxidizer (TO4) to replace the existing Fume Incinerator (IB01) and Regenerative Thermal Oxidizer (RTO3).

D. Process Description

1. SIC Codes(s)

Major - 2952.

Other - 2951.

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility makes asphalt roofing.

3. Overall Facility Process Description

The Roofing Section: The manufacture of asphalt roofing products involves coating, mineral surfacing, cooling and drying, product finishing, cutting and trimming, and packaging. A mat is covered with hot coating in the Coater which is vented to a collection hood. Surfacing materials are applied in the material surfacing area. This area is vented to a process dust collector. The material temperature is reduced in the cooling section which is vented through a collection hood. Sealant asphalt and release tape are applied to some roofing products.

The Asphalt Section: The Company produces oxidized asphalt, for its use and sale to other parties, by bubbling air through liquid asphalt. This is done by using a direct fired non-contact preheater or firing directly into a convertor. Preparation of the asphalt is an integral part of the production of asphalt roofing and has direct impact on the desired characteristics of the roofing asphalt, such as softening point and penetration rate. Also, the facility stores petroleum products and other liquid raw materials. They are delivered via trucks and rail cars which unload into several storage tanks. In order to preserve the characteristics of the stored materials, some of those tanks are kept hot.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is located in the Atlanta area and is a minor source of hazardous air pollutants (HAP) with individual HAP emissions less than 10 tpy and total HAP emissions less than 25 tpy. The facility is presently a minor source with respect to the Prevention of Significant Deterioration (PSD) program since potential regulated PSD pollutant emissions are less than 250 tpy each. However, per GRAQC 391-3-1-.03(8)(c)14(i), facilities in Fulton County with potential emissions of “*at least 100 tons per year of volatile organic compounds or nitrogen oxides*” are considered major sources with respect to the ozone NNSR program. Therefore, the facility is a major source with respect to the ozone non-attainment new source review (NNSR) program as emissions of VOC exceed the major source threshold of 100 tpy.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓	✓		
VOC	✓	✓		
NO _x	✓			✓
CO	✓	✓		
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The facility is a minor source for HAPs and is, therefore, not subject to 40 CFR 63 Subpart LLLLL, *National Emission Standards for Hazardous Air Pollutants (NESHAPs): "Asphalt Processing and Asphalt Roofing Manufacturing."* However, the facility is subject to 40 CFR 63 Subpart AAAAAAA, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing.*

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Conditions 2.2.1 and 2.2.2 address facility-wide federal rule standards potentially applicable are the general provisions of 40 CFR 60, *New Source Performance Standards* (NSPS), and the general provisions of 40 CFR 63, *National Emission Standards for Hazardous Air Pollutants* (NESHAP), specified in Table 5 to 40 CFR 63 Subpart AAAAAAA.

C. Compliance Status

Title V permit Application No. 589497 does not indicate that any emission unit or group in the facility is operating out of compliance with any of the applicable rules or regulations.

D. Permit Conditions

No facility-wide conditions are included in the permit other than NSPS and NESHAP general requirements and the general provisions in Section VIII.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Will be inserted later to save paper

<<<< COPY & PASTE EQUIPMENT LIST FROM PERMIT HERE >>>>

B. Equipment & Rule Applicability

Emission and Operating Caps:

The limits in Section 3.2, of Title V permit No. 2952-121-0334-V-04-0, are being carried over in the enclosed Title V renewal permit. Owens Corning Roofing and Asphalt, LLC - Atlanta Plant had those limits placed to either avoid some of the requirements of 40 CFR 52.21, *Prevention of Significant Deterioration (PSD)*, or being classified as a major source of HAPs under 40 CFR 63, *National Emission Standards for Hazardous Air Pollutants*.

Rules and Regulations Assessment:

In addition to the State rules, the most prominent of which are summed up in Section 3.4 of the enclosed permit, this asphalt roofing plant is subject to 40 CFR 60 Subpart UU, *Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture*, and 40 CFR 63 Subpart AAAAAAA, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing*.

C. Permit Conditions

The only significant changes made by Owens Corning Roofing and Asphalt, LLC - Atlanta Plant since Title V renewal permit No. 2952-121-0334-V-04-0 was issued, on February 2, 2017, are those addressed in permit amendment No. 2952-121-0334-V-04-1 (namely, the addition of new permit Condition 4.2.2 and update of existing Conditions 5.2.1, 5.2.5, 6.1.7, 6.2.5 and 7.1.2). Title V Application TV-589497 does not request making other changes. Accordingly, with the exception of inserting the changes made in permit amendment No. 2952-121-0334-V-04-1, the conditions of Title V permit No. 2952-121-0334-V-04-0 were carried over to the enclosed permit.

Title V Application TV-589497, states that the following minor changes have occurred at the Atlanta Plant since Permit No. 2952-121-0334-V-04-0 was issued in 2017.

- In January of 2018, OCRA submitted a letter to Georgia EPD to reconfigure dust and fume collection pickup points and improve dust and fume capture efficiency. As part of this project, OCRA replaced the existing Cold Filler Bin Dust Collector (Air Pollution Control Device [APCD] ID No. DC3), which controls air emissions from the Filler Upper Surge Hopper (Emission Unit [EU] ID No. 1203), added particulate ports to the Granule Unloading Area (EU1205), which is controlled by a dust collector (APCD ID No. DC5), extended the existing coater hood which captures asphalt fumes generated by the Asphalt Coater No. 2 (EU ID No. 1103), replaced ductwork and piping and installed polycarbonate panels [to improve] emissions capture from the Asphalt Filler Mixer (EU ID No. 1206), Asphalt Coater No. 2 (EU ID No. 1103), and other emission points, and relocated the Granule Truck Unloading Conveyor System, which transfers granules to the Bulk Granule Handling System (EU ID No. 1205).
- In February of 2020, OCRA submitted a letter to Georgia EPD to install and operate a new nail line paint applicator to apply nailer markers to the asphalt roofing shingles by use of paint roller. The new nail line paint applicator applies paint after the asphalt coater (EU ID No. 1103) but prior to the cooling area (EU ID No. 1401).

- In August of 2020, OCRA submitted a letter to Georgia EPD to install and operate four 315,000 Btu/hour (combined 1.26 MMBtu/hr) natural gas fired infrared heaters to increase the temperature of the fiberglass mat prior to entering the asphalt coater to improve sheet product characteristics.
- In December of 2020, OCRA submitted a letter to Georgia EPD to replace an existing asphalt preheater (0104) with a new 9.90 MMBtu/hr natural gas-fired preheater.
- In July of 2021, OCRA submitted an application for a Title V minor modification with construction for the replacement of the Fume Incinerator (APCD ID No. IB01) and Regenerative Thermal Oxidizer (RTO) No. 3 (APCD ID No. RTO3) with a new 17 MMBtu/hr natural gas-fired Thermal Oxidizer(TO) (APCD ID No. TO4) in the asphalt plant portion of the facility.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Required initial performance tests have been completed). However, the enclosed permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment and Condition 4.2.1 is meant to require initial performance test be performed in accordance with 40 CFR 60.8 and 63.7 and the applicable NSPS or NESHAP Subpart. Also, testing Condition 4.2.2 will need to be satisfied in accordance with Title V permit amendment No. 2952-121-0334-V-04-1. It is worth-noting that Condition 4.2.2 was added to address NSPS and NESHAP testing required to be conducted on the Thermal Oxidizer No. 4 (TO4).

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Other than the update of Condition 6.2.5, no new monitoring conditions are being added in the enclosed Title V Renewal Permit.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, the Compliance Assurance Monitoring Regulations (CAM), facilities are required to prepare and submit monitoring plans for certain emission units with the Title V application. Each emission unit controlled by a control device that *"has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source,"* as defined by 40 CFR §64.2(a)(3) is subject to CAM.

Permit No. 2952-121-0334-V-03-0 has CAM related Conditions. However, those conditions were not being carried over in Title V permit No. 2952-121-0334-V-04-0 because CAM no longer applies due to the fact that the more stringent provisions of 40 CFR 63 Subpart AAAAAAA, make the facility falls under 40 CFR 64.2(b)(i) which exempts from CAM equipment subject to *"emission limitations or standards proposed by the [EPA] Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act."*

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

None is being added to in the enclosed Title V Renewal Permit.

VII. Specific Requirements

A. Operational Flexibility

See Condition 7.1.2.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.

See Attachment B of the permit

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None associated with the enclosed permit.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//