

Title V Permit Evaluation

Site Number: A0119

Site Name: Johns Manville

Site Address: East 3rd & Harbor Street, Pittsburgh, CA 94565

Periodic Monitoring:

SO₂ Sources

S# & Description	Federally Enforceable Emission Limit Citation	Federally Enforceable Emission Limit	Potential to Emit: tpy	Monitoring
Boiler S-45	BAAQMD Regulation 9-1-301	GLC of 0.5 ppm for 3 minutes or 0.25 ppm for 60 minutes or 0.05 ppm for 24 hours		No monitoring because source has permit to burn natural gas only
	BAAQMD Regulation 9-1-302	300 ppm (dry) general emission limitation of sulfur dioxide		No monitoring because source has permit to burn natural gas only
Asphalt Blowing Tower S-70	BAAQMD Regulation 9-1-301	GLC of 0.5 ppm for 3 minutes or 0.25 ppm for 60 minutes or 0.05 ppm for 24 hours		Not recommended
	BAAQMD Regulation 9-1-302	300 ppm (dry) general emission limitation of Sulfur Dioxide		Source test every five years
Asphalt Coating Tank S-75	BAAQMD Regulation 9-1-301	GLC of 0.5 ppm for 3 minutes or 0.25 ppm for 60 minutes or 0.05 ppm for 24 hours		Not recommended
	BAAQMD Regulation 9-1-302	300 ppm (dry) general emission limitation of Sulfur Dioxide		Not recommended

SO₂ Discussion:

AP-42, Chapter 11.2 states that the primary emissions from the roofing industry are particulate and volatile organic compounds. SO₂ is not mentioned as a pollutant of concern. One source test per permit term will be required for the S-70, Asphalt Blowing Tower, since the asphalt contains sulfur and

the air stream that is used to oxidize the asphalt is sent to an oxidizer. No SO2 monitoring will be required for the tank since there is no indication that there are SO2 emissions at the tank.

NO_x Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Boiler S-45	BAAQMD Regulation 9-7-301.1	30 ppmv @ 3% Oxygen	3 tons/yr	Not recommended

CO Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Boiler S-45	BAAQMD Regulation 9-7-301.2	400 ppmv @ 3% Oxygen	5 tons/yr	Not recommended

VOC Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Asphalt Loading Rack S-79	BAAQMD Regulation 8-2-301	300 ppm and 15 pounds per day		Not recommended based on asphalt's low vapor pressure
LPA Application System S-80	BAAQMD Regulation 8-2-301	300 ppm and 15 pounds per day		Not recommended based on asphalt's low vapor pressure
Solvent Wipe Cleaning Operation S-90	BAAQMD Condition #7061, part 2	1500 gal solvent per any consecutive 12-month period		Records

VOC Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
	BAAQMD Condition #7061, part 3	< 5 gal solvent per any consecutive 24-hour period		Records

VOC Discussion:

S-70, Asphalt Blowing Tower is exempt from Regulation 8, Rule 2, Miscellaneous Operations, because it is subject to Regulation 10, Standards of Performance for New Stationary Sources.

PM Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Coating Surge Tank, S-14	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8a	114,000 tons/yr		Weekly records
Asphalt Tanks S-20, S-91, S-92, S-93	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	NSPS Sub-part UU 40 CFR 60.473(c)	Limits opacity of exhaust gases from storage tanks to 0%, except for 15 minutes in any 24 hour period for transfer line blowing		Quarterly visible emissions check
	BAAQMD Condition #17454, part # 5	Visible particulate emissions from asphalt tanks shall not exceed 0.5 Ringelmann		Quarterly visible emissions check
	BAAQMD Condition # 17454, part 1	Combined asphalt throughput not to exceed 275,000 tons per year		Quarterly records

PM Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Roofing backing sand applicator, S-31	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8b	21,900 tons/yr		Weekly records
Filler machine bin, S-39	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8c	20,000 tons/yr		Weekly records
Filler storage silo, S-40	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8d	20,000 tons/yr		Weekly records
Steam boiler, S-45	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		None recommended
	BAAQMD 6-310.3	0.15 grains/dscf @ 6% O ₂		None recommended
Bulk storage systems S-46, S-47	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check

PM Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Bulk storage systems S-46, S-47	BAAQMD Condition #17447, parts 8e and f	73,000 tons/yr each source		Weekly records
Asphalt coater, S-54	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8g	30,000 tons/yr		Weekly records
Coater #1 Roofing Machine, S-56	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8h	96,360 tons/yr		Weekly records
Asphalt Blowing Tower, S-70	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Temperature monitoring
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Temperature monitoring
	40 CFR 60.472 (b)(1)	Particulate emissions shall not exceed 0.67 kg/per megagram		Temperature monitoring
	BAAQMD 12-3-301	> 1202 degrees F		Temperature monitoring
	BAAQMD Condition #17420, part 11	245,000 tons per year		Weekly records
Asphalt Coating Tank, S-75	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check

PM Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
Asphalt Coating Tank, S-75	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8h	8,600,000 gallons/yr		Weekly records
LPA Application System, S-80	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
Horizontal Asphalt Mixer, S-81	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	BAAQMD Condition #17447, part 8j	219,000 tons/yr		Weekly records
Asphalt storage tank, S-95	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	NSPS Sub-part UU 40 CFR 60.473(c)	Limits opacity of exhaust gases from storage tanks to 0%, except for 15 minutes in any 24 hour period for transfer line blowing		Quarterly visible emissions check
	BAAQMD Condition # 11613, part 1	Asphalt 45,400 tons per year		Quarterly records
Granule/Sand Storage Silos, S-96 to S-100	BAAQMD 6-301	Ringelmann 1 for no more than 3 minute in any hour		Quarterly visible emissions check

PM Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
	BAAQMD 6-310	0.15grains/dscf		Quarterly visible emissions check
	BAAQMD 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		Quarterly visible emissions check
	Condition 17213 part #1	< 6220 tons per year for each tank		Daily records

PM Discussion:

Visible Emission:

BAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for a period or aggregate periods less than 3 minutes in any hour). In an effort to bring awareness to this limit, permit conditions are added to each of the above sources requiring the source operator to visually monitor the source for visible emissions while the source is in operation. While this approach does not guarantee compliance with Ringelmann 1.0, it does put the responsibility of monitoring for visible emissions on the person who is best able to correct a visible emission problem, the source operator.

All sources of particulate, except for S-45, Boiler, have a new requirement for inspection of visible emissions on a monthly, quarterly or annual basis. S-70, Asphalt Blowing Tower, also has a requirement for continuous monitoring of the temperature of the oxidizer, A-70.

The boiler, S-45, does not require monitoring to ensure compliance with the particulate standards because it burns only natural gas.

Permit Shield:

No permit shield was requested

Alternate Operating Scenario:

No alternate operating scenario was requested

Compliance Status:

Sources S-96, 97, 98, 99 and 100 did not have permits. The company was asked to submit an application for the sources. The company cooperated and the issue was resolved by permitting the sources. The facility certified compliance with all other requirements on October 13, 1995. One year after the Title V permit is issued, and every year thereafter, the facility will be obligated a new

compliance certification. The facility has received two violation notices since October 13, 1995. Both violations were resolved on July 9, 1997.

Alignment of Information in Application and Proposed Permit:

The company was given a chance to scrutinize the throughput limits and were allowed to make changes if they considered the proposed limits to be outside their operating range.