New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00004/00039
Renewal Number: 1
Modification Number: 4 08/15/2013

Facility Identification Data
Name: OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH
Address: 1277 FEURA BUSH RD
FEURA BUSH, NY 12067

Owner/Firm
Name: OWENS CORNING INSULATING SYSTEMS LLC
Address: 1 OWENS CORNING PKWY
TOLEDO, OH 43659, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: ANGELO A MARCUCCIO
Address: NYSDEC
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014
Phone:5183572069

Division of Air Resources:
Name: MICHAEL P CRONIN
Address: NYSDEC
625 BROADWAY
ALBANY, NY 12233-3254
Phone:5184028403

Air Permitting Contact:
Name: DAVID A KRENITSKY
Address: OWENS-CORNING DELMAR PLANT
1277 FEURA BUSH RD
FEURA BUSH, NY 12067
Phone:5184753673

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
This modification to the Title V permit establishes emission limits (caps) so that the facility may avoid applicability of Best Available Retrofit Technology (BART) requirements under 6 NYCRR Part 249. By incorporating these emission caps, the combined potential emissions from all BART-eligible units are

restricted to less than 250 tons per year of each visibility impairing pollutant; i.e., nitrogen oxides (NOx), sulfur dioxide (SO2), and particulate matter less than 10 microns in diameter (PM-10). As a result, the facility is not subject to BART under Part 249. These emission caps apply to emission units U-00002, U-00003, U-00012, U-00013, and U-00014 which pertain to the glass furnaces and associated forming, curing, cooling, and smoke stripper sections of the two wool fiberglass insulation manufacturing lines.

In addition, this permit modification incorporates conditions in order for the facility to comply with the NOx Reasonably Available Control Technology (RACT) requirements for glass plants under 6 NYCRR Subpart 220-2. The existing furnace oxy-fuel firing control technology is already considered to be NOx RACT for each of the glass melting furnaces at the facility. However, Subpart 220-2 also requires each glass furnace at the facility to meet a facility specific NOx emission limit in pounds of NOx per ton of glass pulled and requires the installation of a continuous emissions monitoring system (CEMS) to demonstrate compliance with such emission limit. This permit modification sets forth the NOx emission limit and CEMS requirements for the glass furnaces.

Furthermore, the permit has been modified to remove existing conditions pertaining to 40 CFR Part 63, Subpart NNN which is the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wool Fiberglass Manufacturing. The most recent renewal and modification to the Title V permit on November 5, 2010 allowed the facility to convert its operations from a phenol-formaldehyde based binder to a non-phenol, non-formaldehyde starch-based binder system. With the completion of this binder system conversion in February 2011 for the DM1 production line and in September 2011 for the DM2 production line, the facility no longer uses phenol and formaldehyde binders. Therefore, consistent with a determination by the United States Environmental Protection Agency (USEPA) that the facility would no longer meet the definition of an affected facility under Subpart NNN upon completion of the starch-based binder system conversion, the facility is no longer subject to the Subpart NNN NESHAP requirements.

Other minor changes have been made to the permit for clarity and consistency purposes.

Attainment Status

OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH is located in the town of BETHLEHEM in the county of ALBANY.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of

nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
The Owens Corning Insulating Systems, LLC facility in Feura Bush, New York (OCIS Delmar Plant) manufactures wool fiberglass insulation products through the operation of two glass furnaces and associated production lines (DM1 and DM2) along with air pollution control equipment including electrostatic precipitators.

Permit Structure and Description of Operations
The Title V permit for OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH is defined by the following emission unit(s):

Emission unit U00015 - THIS UNIT REPRESENTS THE DM2 ASPHALT APPLICATOR AND FLEXOGRAPHIC PRINTING, WHICH CONTAINS EMISSION POINT 00019, AND IS LOCATED IN BUILDING 1.

Emission unit U00015 is associated with the following emission points (EP):
00019
Process: AA2 is located at Building 1 - DM-2 ASPHALT APPLICATOR. PROCESS APPLIES A THIN COAT OF PETROLEUM-BASED ASPHALT TO PAPER SUBSTRATE THAT IS THE BACKING OF FIBERGLASS INSULATION.

Process: FG2 is located at Building 1 - DM-2 FLEXOGRAPHIC PRINTING. THIS PROCESS USES INK TO PRINT INFORMATION ON THE FIBERGLASS BACKING.

Emission unit U00012 - THIS EMISSION UNIT REPRESENTS THE DM2 OXY FUEL MELTER, CONTAINS EMISSION POINTS 00200, 000201 AND IS LOCATED IN BUILDING 1. EMISSION

POINT 00200 FEEDS INTO THE COMMON STACK, EMISSION POINT 00300. EMISSION POINT 00201 IS USED STRICTLY FOR DEP EMERGENCY SHUTDOWN, MAINTENANCE, OR MALFUNCTION. WHEN A BYPASS SITUATION OCCURS IT IS BEST PRACTICE TO KEEP THE FURNACE IN A CONDITION OF THERMAL STABILITY BY MAINTAINING ITS PULL RATE. SHUTTING IT OFF OR EVEN RESTRICTING THE MOLTEN GLASS OUTPUT FOR THIS TYPE OF FURNACE AS A PERCEIVED MEANS OF REDUCING EMISSIONS CAN THERMALLY SHOCK THE FURNACE REFRACTORY RESULTING IN FAILURE OR REDUCED LIFE OF THE CAPITAL ASSET. BY REDUCING THE SURFACE AREA AND THICKNESS OF THE INSULATING CRUST OF UNMELTED BATCH SUCH ACTIONS CAN ALSO ACTUALLY INCREASE EMISSIONS.

Emission unit U00012 is associated with the following emission points (EP):
00201
Process: OX2 is located at Building 1 - CONVERSION OF SAND AND MINERAL BATCH TO GLASS BY THERMAL HEATING THROUGH OXY FUEL FIRED MELTER. THIS PROCESS IS HANDLED BY EMISSION POINT 00300 IN NORMAL OPERATING MODE AND 00201 DURING DEP EMERGENCY SHUTDOWN, MAINTENANCE OR MALFUNCTION.

Emission unit U00006 - THIS UNIT REPRESENTS FACILITY STORAGE TANKS INCLUDING RED DYE, ASPHALT, and PROCESS OIL. THIS UNIT CONTAINS EMISSION POINTS 00007, 00008, 00009, 00010, 00012, 00020, 00024. EMISSION POINTS 00007 AND 00008 ARE LOCATED IN BUILDING 1 AND EMISSION POINTS 00009 THROUGH 00012, 00020 AND 00024 ARE LOCATED IN BUILDING 2. AS PART OF THE CONVERSION TO A STARCH-BASED BINDER SYSTEM, THERE ARE TWO NEW MALTODEXTRIN TANKS (AT 15,227 GALLONS EACH), AND THE EXISTING 13,900 GALLON TANK WILL BE MODIFIED TO STORE SODIUM HYDROXIDE. IN ADDITION, THERE ARE TWO NEW STORAGE TANKS (A SODIUM HYPOPHOSPHITE TANK AT 6,189 GALLONS AND A CITRIC ACID TANK AT 8,225 GALLONS) THAT ARE BELOW THE EXEMPTION LEVELS NOTED IN 6 NYCRR 201-3.2(C)(25) AND, THEREFORE, ARE NOT REQUIRED TO BE INDIVIDUALLY LISTED ELSEWHERE IN THIS PERMIT.

Emission unit U00006 is associated with the following emission points (EP):
00009, 00011, 00012, 00020, 00040, 00041, 00042
Process: 212 is located at Building 1 - STORAGE TANKS INCLUDING RED DYE, ASPHALT, AND PROCESS OIL TANKS.

Process: 229 is located at Building 1 - STORAGE TANKS INCLUDING RED DYE, ASPHALT, AND PROCESS OIL TANKS.

Process: MSH is located at Building 1 - Storgage tanks including two Maltodextrin (MALT1 & MALT2) tanks and one Sodium Hydroxide (NAOH1) tank.

Emission unit U00013 - THIS UNIT REPRESENTS THE DM2 MIXING CHAMBER, WHICH CONTAINS EMISSION POINT 00017, AND IS LOCATED IN BUILDING 1.

Emission unit U00013 is associated with the following emission points (EP):
00017
Process: FC2 is located at Building 1 - DM-2 MIXING CHAMBER. MIXING CHAMBER MIXES 2

AIR STREAMS: 1) SATURATED AIR FROM THE FIBER FORMING PROCESS THAT GOES THROUGH A DROPOUT BOX AND MOISTURE ELIMINATOR; AND 2) EXHAUST AIR FROM THE CURE OVEN AFTERBURNER. THE OVEN CURES THE FIBER PACK PRIOR TO F ABRICATION.

Emission unit U00003 - THIS UNIT REPRESENTS THE DM-1 MIXING CHAMBER, FORMING ZONES, CURING OVEN, COOLING SECTION, STRIPPING SECTION AND THE MIST CONTROL SYSTEM FOR THE FORMING BASEMENT, WHICH CONTAINS EMISSION POINTS 00005, 00006, 00022, 00102, 00103, 00104, AND 00105, LOCATED IN BUILDING 1.

Emission unit U00003 is associated with the following emission points (EP):
00005, 00006, 00022, 00102, 00103, 00104, 00105
Process: BP1 THIS PROCESS REPRESENTS THE OPERATION OF DM1 COOLING SECTION BY ITSELF WHILE DM1 SMOKE STRIPPER IS OUT OF SERVICE DUE TO SCHEDULED MAINTENANCE EVENTS. SECTION 201-1.4 APPLIES DURING SCHEDULED MAINTENANCE WHICH IS PERFORMED UNDER PART 200.7.

Process: CO1 is located at Building 1 - THIS PROCESS INVOLVES THE OPERATION OF A CURING OVEN WHICH CURES THE FIBER PACK PRIOR TO FABRICATION.

Process: CS1 is located at Building 1 - THIS PROCESS INVOLVES THE COOLING OF THE PACK PRIOR TO PACKAGING BY PASSING AIR THROUGH THE PACK. THIS PROCESS CONTAINS EMISSION POINT 00006.

Process: FZ1 is located at Building 1 - FORMING ZONES FZ001, FZ002, FZ005, AND FZ006 DRAW PACK FORMING AIR FROM BENEATH THE PACK FORMING CONVEYOR. THIS PROCESS IS HANDLED BY EMISSION POINT 00005.

Process: FZ2 is located at Building 1 - FORMING ZONES FZ003 AND FZ004 DRAW PACK FORING AIR FROM BENEATH THE PACK FORMING CONVEYOR. THIS PROCESS IS VENTED THROUGH EMISSION POINTS 00102 AND 00103.

Process: ME1 is located at Building 1 - THIS PROCESS PROVIDES THE VENTILATION FOR THE BASEMENT PORTION OF THE FORMING ZONES.

Process: SS1 is located at Building 1 - THIS PROCESS IS USED TO DRAW AIR THROUGH THE PACK TO "STRIP" OUT THE SMOKE AND POLLUTANT GASES. THIS PROCESS IS SERVED BY EMISSION POINTS 00102 AND 00103 DURING NORMAL OPERATION, AND 00104 AND 00022 DURING WEST ELECTROSTATIC PRECIPITATOR DOWNTIME. OPERA TION OF DM1SS DOES NOT REQUIRE THE SIMULTANEOUS USE OF CONTROLS.

Emission unit U00002 - THIS UNIT REPRESENTS THE DM-1 OXY-FUEL MELTER, CONTAINS EMISSION POINTS 00100 AND 00101, AND IS LOCATED IN BUILDING 1. EMISSION POINT 00100 FEEDS INTO THE NEW, COMMON STACK, EMMISSION POINT 00300. EMISSION POINT 00101 IS USED STRICTLY FOR DEP EMERGENCY SHUTDOWN, MAINTENANCE, OR MALFUNCTION. WHEN A BYPASS SITUATION OCCURS IT IS BEST PRACTICE TO KEEP THE FURNACE IN A CONDITION OF THERMAL STABILITY BY MAINTAINING ITS PULL RATE. SHUTTING IT OFF OR EVEN RESTRICTING THE MOLTEN GLASS OUTPUT FOR THIS TYPE OF

FURNACE AS A PERCEIVED MEANS OF REDUCING EMISSIONS CAN THERMALLY SHOCK THE FURNACE REFRACTORY RESULTING IN FAILURE OR REDUCED LIFE OF THE CAPITAL ASSET. BY REDUCING THE SURFACE AREA AND THICKNESS OF THE INSULATING CRUST OF THE UNMELTED BATCH CAN ALSO RESULT IN ACTUALLY INCREASED EMISSIONS.

Emission unit U00002 is associated with the following emission points (EP):
00101, 00300
Process: OX1 is located at Building 1 - CONVERSION OF SAND AND MINERAL BATCH TO GLASS BY THERMAL HEATING THROUGH OXY FUEL FIRED MELTER. THIS PROCESS IS HANDLED BY EMISSION POINT 00300 IN NORMAL OPERATING MODE AND 00101 DURING DEP EMERGENCY SHUTDOWN, MAINTENANCE OR MALFUNCTION.

Emission unit U00014 - THIS UNIT REPRESENTS THE DM2 COOLING AREA, COMPRISED OF DM2 SMOKE STRIPPER AND DM2 COOLING SECTION. THIS UNIT CONTAINS EMISSION POINT 00018 AND 00021, AND IS LOCATED IN BUILDING 1.

Emission unit U00014 is associated with the following emission points (EP):
00018, 00021
Process: CS2 is located at Building 1 - DM-2 COOLING AREA. THIS PROCESS REPRESENTS THE OPERATION OF DM2 COOLING SECTION BY ITSELF WHILE DM-2 SMOKE STRIPPER IS OUT OF SERVICE DUE TO SCHEDULED MAINTENANCE EVENTS. SECTION 201.14 APPLIES DURING THIS SCHEDULED MAINTENANCE WHICH IS PERFORMED UNDER SECTION 200.7.

Process: SC2 is located at Building 1 - DM-2 COOLING AREA. THIS PROCESS REMOVES SMOKE FROM THE CURED FIBERGLASS AND DRAWS COOLING AIR THROUGH THEH GLASS PACK.

Emission unit U00011 - THIS UNIT REPRESENTS THE DM2 MIXED BATCH BIN, WHICH CONTAINS EMISSION POINT 00014, AND IS LOCATED IN BUILDING 1.

Emission unit U00011 is associated with the following emission points (EP):
00014
Process: MB2 is located at Building 1 - DM-2 MIXED BATCH BIN. PROCESS PROVIDES FOR SURGE STORAGE OF MIXED (SAND AND MINERAL) BATCH AT THE FURNACE. THE MIXED BATCH IS PNEUMATICALLY CONVEYED FROM A SEPARATE BLENDING OPERATION TO THIS BATCH BIN.

Emission unit U00005 - THIS UNIT REPRESENTS THE DM-1 ASPHALT APPLICATOR AND FLEXOGRAPHIC PRINTING, WHICH CONTAINS EMISSION POINT 00013, AND IS LOCATED IN BUILDING 1.

Emission unit U00005 is associated with the following emission points (EP):
00013
Process: AA1 is located at Building 1 - PROCESS APPLIES A THIN COATING OF PETROLEUM-BASED ASPHALT TO PAPER FOR THE BACKING ON FIBERGLASS INSULATION.

Process: FG1 is located at Building 1 - THIS PROCESS USES INK TO PRINT INFORMATION ON THE FIBERGLASS BACKING (PAPER SUBSTRATE)

Emission unit U00007 - THIS UNIT REPRESENTS THE BINDER ROOM, WHICH CONTAINS EMISSION POINT 00027, AND IS LOCATED IN BUILDING 1. FOUR NEW STORAGE TANKS (ONE BINDER MIX TANK AT 917 GALLONS AND THREE BINDER CIRCULATION TANKS AT 1,202 GALLONS EACH) ARE BEING ADDED AS PART OF THE CONVERSION TO A STARCH-BASED BINDER SYSTEM. ALL OF THESE TANKS HAVE CAPACITIES BELOW THE EXEMPTION LEVELS NOTED IN 6 NYCRR 201-3.2(C)(25) AND, THEREFORE, ARE NOT REQUIRED TO BE INDIVIDUALLY LISTED ELSEWHERE IN THIS PERMIT.

Emission unit U00007 is associated with the following emission points (EP):
00027
Process: BDR is located at Building 1 - BINDER ROOM CONTAINS VARIOUS PROCESS MIX TANKS USED IN THEH PRODUCTION OF BINDER. THE BINDER ROOM IS EXHAUSTED THROUGH A CEILING FAN.

Emission unit U00008 - THIS UNIT REPRESENTS DM-1 BAGGING EQUIPMENT, WHICH CONTAINS EMISSION POINTS 00030 AND 00031, AND IS LOCATED IN BUILDING 1.

Emission unit U00008 is associated with the following emission points (EP):
00030, 00031
Process: BC1 is located at Building 1 - EIGHT COLLECTION UNITS ASSOCIATED WITH FIBERGLASS INSULATION BAGGING EQUIPMENT.

Emission unit U00009 - THIS UNIT REPRESENTS THE DM-1 CONDITIONING AND FOREHEARTH AREA WHICH CONTAINS EMISSION POINT 00035, AND IS LOCATED IN BUILDING 1.

Emission unit U00009 is associated with the following emission points (EP):
00035
Process: CA1 is located at Building 1 - THE CONDITIONING AREA INCLUDES THE CONDITIONING SECTION AND FOREHEAERTH OF THE HOT END, THE AREAS SURROUNDING THE FURNACE, AND THE BATCH CHARGER SYSTEM. EMISSIONS FROM THESE THREE ACTIVITIES ORIGINATE INSIDE THE BUILDING AND EVENTUALLY EXIT THE BUILDING THROUGH LOUVERS.

Emission unit U00010 - THIS UNIT REPRESENTS MISCELLANEOUS FUGITIVE EMISSION SOURCES INCLUDING: 2 INK JET PRINTERS, A WASH WATER SYSTEM, AGGREGATE CULLET STORAGE PILE, AND UNLOADING AND MIXING OF GLASS BATCH MATERIAL. THE WASH WATER SYSTEM IS LOCATED IN BUILDING 1, THE AGGREGATE CULLET STORAGE PILE IS LOCATED IN BUILDING 4, AND THE UNLOADING AND MIXING OF GLASS BATCH MATERIAL IS LOCATED IN BUILDING 3. TWO NEW STORAGE TANKS (A HOOD WALL WASH WATER RECIRCULATION TANK AT 2,000 GALLONS AND A BINDER MAKE-UP WATER TANK AT 1,737 GALLONS) ARE BEING ADDED AS PART OF THE CONVERSION TO A STARCH-BASED BINDER SYSTEM. THESE TWO TANKS HAVE CAPACITIES BELOW THE EXEMPTION LEVELS NOTED IN 6 NYCRR 201-3.2(C)(25) AND, THEREFORE, ARE NOT REQUIRED TO BE INDIVIDUALLY LISTED ELSEWHERE IN THIS PERMIT.

Process: FES is located at Building 1 - FUGITIVE EMISSION SOURCES INCLUDING; WASH WATER SYSTEM, AGGREGATE CULLET STORAGE PILE, AND UNLOADING AND MIXING OF GLASS BATCH MATERIAL.

Process: INK is located at Building 1 - FUGITIVE EMISSIONS FROM INKJET PRINTING.

Emission unit U00017 - THIS UNIT REPRESENTS THE PENCIONE COLLECTORS 1,2,3 AND 4 WHICH CONTAINS EMISSION POINT 00028 AND 00029, AND IS LOCATED IN BUILDING 1.

Emission unit U00017 is associated with the following emission points (EP):
00028, 00029
Process: PC1 THE PENCIONE UNITS ARE USED TO COLLECT PARTICULATE MATTER RESULTING FROM FIBERGLASS CUTTING, TRIMMING, AND REPACK OPERATIONS.

Emission unit U00016 - THIS UNIT REPRESENTS THE DM2 BAGGING EQUIPMENT, WHICH CONTAINS EMISSION POINT 00032, AND IS LOCATED IN BUILDING 1.

Emission unit U00016 is associated with the following emission points (EP):
00032
Process: BC2 is located at Building 1 - DM-2 BAGGING EQUIPMENT. EIGHT DUST COLLECTION UNITS ASSOCIATED WITH THE FIBERGLASS BAGGING EQUIPMENT.

Emission unit U00018 - THIS UNIT REPRESENTS THE DM2 CONDITIONING AREA, WHICH CONTAINS EMISSION POINT 00036, AND IS LOCATED IN BUILDING 1.

Emission unit U00018 is associated with the following emission points (EP):
00036
Process: CA2 is located at Building 1 - CONDITIONING

Emission unit U00001 - THIS EMISSION UNIT REPRESENTS THE DM-1 MIXED BATCH BIN, CONTAINS EMISSION POINT 00002 AND IS LOCATED IN BUILDING 1.

Emission unit U00001 is associated with the following emission points (EP):
00002
Process: MB1 is located at Building 1 - PROCESS PROVIDES FOR SURGE STORAGE OF MIXED (SAND & MINERAL) BATCH AT THE FURNACE. THE MIXED BATCH IS PNEUMATICALLY CONVEYED FROM A SEPARATE BLENDING OPERATION TO THIS BATCH BIN.

Title V/Major Source Status
OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH is subject to Title V requirements. This determination is based on the following information:
The facility is major for NOx, PM-10, VOC, CO, individual HAP, and total HAP.

Program Applicability
The following chart summarizes the applicability of OWENS-CORNING INSULATING SYSTEMS-FEURA BUSH with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS)
for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA)
which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to
be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that

apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis
of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3296	MINERAL WOOL

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents
a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-05-012-02	MINERAL PRODUCTS MINERAL PRODUCTS - FIBERGLASS MANUFACTURE RECUPERATIVE FURNACE (WOOL-TYPE FIBER)
3-05-012-04	MINERAL PRODUCTS MINERAL PRODUCTS - FIBERGLASS MANUFACTURE FORMING: ROTARY SPUN (WOOL-TYPE FIBER)
3-05-012-05	MINERAL PRODUCTS MINERAL PRODUCTS - FIBERGLASS MANUFACTURE CURING OVEN: ROTARY SPUN (WOOL-TYPE FIBER)
3-05-012-06	MINERAL PRODUCTS MINERAL PRODUCTS - FIBERGLASS MANUFACTURE COOLING (WOOL-TYPE FIBER)

3-05-012-21	MINERAL PRODUCTS MINERAL PRODUCTS - FIBERGLASS MANUFACTURE Raw Material: Unloading/Conveying
3-05-012-99	MINERAL PRODUCTS MINERAL PRODUCTS - FIBERGLASS MANUFACTURE Other Not Classified
4-05-005-99	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL INK THINNING SOLVENT - OTHER NOT SPECIFIED
4-07-999-98	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS Specify in Comments

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE lbs/yr	PTE Range
007664-41-7	AMMONIA		>= 100 tpy but < 250 tpy
007440-36-0	ANTIMONY		> 0 but < 10 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 100 tpy but < 250 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
007440-48-4	COBALT		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE		>= 10 tpy
007647-01-0	HYDROGEN CHLORIDE		> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE		> 0 but < 10 tpy
007783-06-4	HYDROGEN SULFIDE		>= 2.5 tpy but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-96-5	MANGANESE		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL		>= 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 100 tpy but < 250 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy but < 75,000 tpy

000108-95-2	PHENOL	>= 10 tpy
0NY075-02-5	PM 2.5	>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
007446-09-5	SULFUR DIOXIDE	>= 100 tpy but < 250 tpy
0NY100-00-0	TOTAL HAP	>= 100 tpy but < 250 tpy
0NY998-00-0	VOC	>= 100 tpy but < 250 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth,

accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions

under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	132	Powers and Duties of the Department with respect to air pollution control
U-00001	40CFR 52-A.21	86	Prevention of Significant Deterioration
U-00002	40CFR 52-A.21	88, 89	Prevention of Significant Deterioration
U-00003	40CFR 52-A.21	94	Prevention of Significant Deterioration
U-00008	40CFR 52-A.21	119	Prevention of Significant Deterioration
U-00009	40CFR 52-A.21	120	Prevention of Significant Deterioration
U-00010	40CFR 52-A.21	121	Prevention of

U-00011	40CFR 52-A.21	4 -12	Significant Deterioration Prevention of Significant Deterioration
U-00012	40CFR 52-A.21	122, 124	Prevention of Significant Deterioration
U-00017	40CFR 52-A.21	131	Prevention of Significant Deterioration
FACILITY	40CFR 60-Kb.110b(b)	41	NSPS for volatile organic liquid storage vessels-applicability and designation of affected facilities
FACILITY	40CFR 63-A.10	48, 49	Recordkeeping and Reporting
FACILITY	40CFR 63-A.4	42	Prohibited Activities and Circumvention
FACILITY	40CFR 63-A.6(e)(1)	43	General Provisions - Operations and Maintenance Requirements During Startup, Shutdown, and Malfunction
FACILITY	40CFR 63-A.6(e)(3)	44	Startup, Shutdown and Malfunction Plan
FACILITY	40CFR 63-A.9	45, 46, 47	Notification Requirements
FACILITY	40CFR 63-JJJJ.3320(b)(2	50	Paper and Other Web Coating NESHAP - emission standard based on mass of coating materials
FACILITY	40CFR 63-JJJJ.3320(b)(3	51	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
FACILITY	40CFR 63-JJJJ.3360(c)	52	Paper and Other Web Coating NESHAP - Determination of organic HAP content
FACILITY	40CFR 63-JJJJ.3400(b)	53	Paper and Other Web Coating NESHAP - Reporting - Initial Notification
FACILITY	40CFR 63-JJJJ.3400(c)(1	54	Paper and Other Web Coating NESHAP - Submission of semiannual compliance reports.
FACILITY	40CFR 63-JJJJ.3400(c)(2	55	Paper and Other Web Coating NESHAP - Semiannual compliance report contents.
FACILITY	40CFR 63-JJJJ.3410(a)	56	Paper and Other Web Coating NESHAP - Record keeping requirements.
FACILITY	40CFR 63-NNN	4 -10	Wool Fiberglass Manufacturing NESHAP

FACILITY	40CFR 64	76, 77	COMPLIANCE ASSURANCE MONITORING
U-00002	40CFR 64	92, 93	COMPLIANCE ASSURANCE MONITORING
U-00003	40CFR 64	95, 96	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ1/FZ1SS	40CFR 64	97, 98	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ1/FZ2SS	40CFR 64	99, 100	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ1/FZ5SS	40CFR 64	101, 102	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ1/FZ6SS	40CFR 64	103, 104	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ2/FZ3SS	40CFR 64	105, 106	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ2/FZ4SS	40CFR 64	107, 108	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ2/FZEP1	40CFR 64	109, 110	COMPLIANCE ASSURANCE MONITORING
U-00003/-/FZ2/FZEP2	40CFR 64	111, 112	COMPLIANCE ASSURANCE MONITORING
U-00012	40CFR 64	127, 128	COMPLIANCE ASSURANCE MONITORING
U-00013/00017/FC2/DM2DB	40CFR 64	130	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64.8	78, 79, 4 -11	CAM - Quality improvement plan (QIP) requirements
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 70	81	State Operating Permits Program
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	133	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 82, 83	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	16	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of

FACILITY	6NYCRR 201-6.5(c)(2)	4	Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	24	Permit shield
FACILITY	6NYCRR 201-7	26, 84, 85, 4 -1, 4 -2, 4 -3, 4 -4, 4 -5, 4 -6, 4 -7	Federally Enforceable Emissions Caps
U-00001	6NYCRR 201-7	86	Federally Enforceable Emissions Caps
U-00002	6NYCRR 201-7	87, 88, 89	Federally Enforceable Emissions Caps
U-00003	6NYCRR 201-7	94	Federally Enforceable Emissions Caps
U-00008	6NYCRR 201-7	119	Federally Enforceable Emissions Caps
U-00009	6NYCRR 201-7	120	Federally Enforceable Emissions Caps
U-00010	6NYCRR 201-7	121	Federally Enforceable Emissions Caps
U-00011	6NYCRR 201-7	4 -12	Federally Enforceable Emissions Caps
U-00012	6NYCRR 201-7	122, 123, 124	Federally Enforceable Emissions Caps
U-00017	6NYCRR 201-7	131	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-1.2	27	Notification.
FACILITY	6NYCRR 202-1.3	28	Acceptable procedures.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	4 -8	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	4 -13	General Prohibitions - visible emissions limited.
U-00005/-/AA1	6NYCRR 211.2	4 -21	General Prohibitions - visible emissions limited.
U-00010	6NYCRR 211.2	138	General Prohibitions - visible emissions limited.
U-00015/-/AA2	6NYCRR 211.2	4 -22	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212	29	General Process Emission Sources
FACILITY	6NYCRR 212.4(a)	4 -9	General Process Emission Sources -

			emissions from new sources and/or modifications
FACILITY	6NYCRR 212.4(c)	31	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	32	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 220-2.3(a)	4 -14	Gaseous emissions from glass melting furnaces - RACT analysis.
FACILITY	6NYCRR 220-2.4(a)	4 -15	Furnace recordkeeping.
FACILITY	6NYCRR 220-2.4(c)	4 -16	NOx Continuous Emissions Monitoring System (CEMS) requirements.
FACILITY	6NYCRR 220-2.4(d)	4 -17	Submissions to the department.
FACILITY	6NYCRR 228-1.10	35	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.3(a)	33	Recordkeeping, reports for VOCs
FACILITY	6NYCRR 228-1.5(a)	34	VOC recordkeeping by the facility
U-00006	6NYCRR 229.3(e)(2)(iv)	114	Volatile organic liquid storage tanks
U-00006	6NYCRR 229.3(e)(2)(v)	115	Volatile organic liquid storage tanks
FACILITY	6NYCRR 231-11.2(b)	136	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
U-00002	6NYCRR 231-2	87	New Source Review in Nonattainment Areas and Ozone Transport Region
U-00012	6NYCRR 231-2	123	New Source Review in Nonattainment Areas and Ozone Transport Region
FACILITY	6NYCRR 231-6	26, 4 -4	Mods to Existing Major Facilities in Nonattainment and Attainment Areas of the State in the OTR
FACILITY	6NYCRR 234.3(a)(1)(i)	36	Control requirements - Ink
FACILITY	6NYCRR 234.5	37	Prohibition of sale or specification
FACILITY	6NYCRR 234.6	38	Handling, storage and dispoal of VOCs
FACILITY	6NYCRR 234.7	39	Recordkeeping requirements
FACILITY	6NYCRR 234.8	40	Opacity

FACILITY	6NYCRR 249	4 -1, 4 -2, 4 -3, 4 -5, 4 -6, 4 -7, 4 -18, 4 -19, 4 -20	Best Available Retrofit Technology

Applicability Discussion:
Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V

permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.5 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.5 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.5 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.5 (d) (5)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.5 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal

frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.5 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 201-6.5 (g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH has been determined to be subject to the following regulations:

40 CFR 52.21
This citation applies to facilities that are subject to Prevention of Significant Deterioration (PSD) provisions; that is, facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i). The Owens Corning Insulating Systems - Feura Bush facility has capped (under 6 NYCRR Subpart 201-7) the past project from PSD applicability requirements by accepting limits on tons of glass pulled per year and pounds per hour emission rates. These limits have been carried over from the initial Title V permit into this permit renewal/modification.

40 CFR 60.110b (b)
This condition requires the facility to maintain a record of the dimensions and capacity for volatile organic liquid storage vessels (tanks) constructed, reconstructed, or modified after July 23, 1984. There are no other requirements for tanks of less than 20,000 gallon design capacity.

40 CFR 63.10
Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40 CFR 63.3320 (b) (2)
This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 4% of the mass of the coating materials as organic HAP for existing sources and 1.6% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3320 (b) (3)
This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 20% of the mass of the coating solids as organic HAP for existing sources and 8% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3360 (c)
This condition requires the facility to calculate the portion of the coating that is organic hazardous air pollutants and spells out which methods are allowable to calculate the content. This condition will ensure that the facility is calculating their emissions of organic HAP in a consistent and easily understandable manner when determining whether they are meeting the emission limits in this subpart.

40 CFR 63.3400 (b)
This condition requires that the facility submit an initial notification no later than one year before the facility needs to be in compliance with this subpart. The notification will include basic information about the facility and will be submitted to EPA Region 2 and the NYSDEC. A permit application may be submitted instead of an initial notification in certain cases.

40 CFR 63.3400 (c) (1)
This condition requires that the facility submit semi-annual compliance reports in order to let NYSDEC know whether the facility has been meeting the emission limits contained in this subpart. This condition spells out the dates that the reports are to be submitted by.

40 CFR 63.3400 (c) (2)
This condition spells out the information that needs to be submitted in the semi-annual compliance reports that must be submitted in order to show that the facility has been meeting the emission limits contained in this subpart.

40 CFR 63.3410 (a)
This condition spells out which records the facility must keep in order to prove that the facility is meeting the requirements in this subpart. The records need to be kept on a monthly basis and include items such as CEM data, material usage, HAP content, and operating parameter data.

40 CFR 63.4
Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. It requires sources to comply with Part 63 requirements regardless of whether those requirements have been included in a title V (NYCRR Part 201-6) permit for the source. Intentional or unintentional concealment of an emission that would otherwise violate a standard is itself a violation.

40 CFR 63.6 (e) (1)
This condition requires the facility to address the emissions of hazardous air pollutants (HAPs) during periods when the process(es) are starting up, shutting down, or malfunctioning. This condition requires the facility to come up with a startup, shutdown, malfunction plan (SSMP) which addresses how the plant personnel will react to each of the situations when the process(es) are not functioning normally and what steps will be taken to reduce the release of HAPs to the atmosphere.

If the facility takes actions which aren't in the SSMP, then the facility needs to notify NYSDEC, and update the SSMP accordingly.

The facility must have the SSMP available upon request for the NYSDEC to review.

40 CFR 63.6 (e) (3)
Paragraph 63.6(e)(3) requires a startup, shutdown, and malfunction (SSM) plan for MACT-affected sources and that the plan be followed.

40 CFR 63.9
Section 63.9 contains default notification requirements and deadlines for initial notifications (existing source: 120 days from promulgation; new source: dependent on size and timing), requests for extension of compliance (dependent on type of extension), notification that a source is subject to special compliance requirements (no later than initial notification), performance test notification (60 days before test), continuous monitoring related notifications (60 days before performance evaluation), and

notifications of compliance status (also refered to as initial compliance reports; 60 days after completion of relevant compliance demonstration activity).

40 CFR 64.8
This section lists the elements of a Quality Improvement Plan (QIP). A QIP may be required if a permittee has a number of exceedances or excursions of its Compliance Assurance Monitoring (CAM) program during during a reporting period.

40 CFR Part 63, Subpart NNN
Non-applicability to starch-based binder conversion: As part of its application submitted to the Department on December 7, 2009 for a permit modification to allow conversion from a binder system based on a phenol-formaldehyde resin to a binder system formulated around a starch-based resin at the Feura Bush facility, Owens Corning Insulating Systems, LLC (OCIS) presented supporting information (dated November 20, 2009 and March 9, 2010) requesting a determination regarding the applicability of the NESHAP for Wool Fiberglass Manufacturing (Subpart NNN) to operations at this facility following the binder conversion. The Department forwarded this request onto the United States Environmental Protection Agency (USEPA), which oversees the federal NESHAP program. In response, USEPA informed the Department on June 15, 2010 of its determination that, upon completion of the conversion to the starch-based binder system, the OCIS Feura Bush facility would no longer meet the definition of an affected facility in 40 CFR 63.1380 and, therefore, would no longer be subject to Subpart NNN. The conversion to the starch-based binder system at the facility was completed in February 2011 for the DM1 production line and in September 2011 for the DM2 production line. Therefore, because the facility no longer uses phenol-formaldehyde binders, it is no longer subject to the Subpart NNN requirements.

The NESHAP for Wool Fiberglass Manufacturing lists three affected sources subject to the standards of Subpart NNN: glass-melting furnaces located at a wool fiberglass manufacturing facility; rotary spin wool fiberglass manufacturing lines producing a bonded wool fiberglass building insulation product; and flame attenuation wool fiberglass manufacturing lines producing a bonded heavy density product. Prior to the switch to a starch-based binder, the facility operated two glass-melting furnaces located at a wool fiberglass manufacturing facility and two rotary spin wool fiberglass manufacturing lines producing a bonded wool fiberglass building insulation product that were subject to Subpart NNN requirements. There is no flame attenuation wool fiberglass manufacturing line at the facility.

Consistent with other Subpart NNN determinations by USEPA for similar wool fiberglass manufacturing facilities elsewhere, the following is the rationale that was used for the Subpart NNN non-applicability determination relating to the starch-based binder conversion. With the switch to a starch-based binder system from a phenol-formaldehyde binder, the facility no longer produces a bonded product and, therefore, does not produce building insulation as defined per Subpart NNN. Because the facility no longer produces building insulation per Subpart NNN, it does not meet the definition of a rotary spin manufacturing line. If there is no rotary spin manufacturing line or flame attenuation manufacturing line located at the facility, then the facility does not meet the definition of a wool fiberglass manufacturing facility in Subpart NNN. Additionally, since the facility is no longer defined as a wool fiberglass manufacturing facility, as a result of the switch to a starch-based binder (i.e., non-phenol, non-formaldehyde), then the glass-melting furnaces located at the facility are no longer subject to Subpart NNN because these furnaces are no longer located at a wool fiberglass manufacturing facility.

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units (i.e., sources) that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Conditions requiring 3rd field secondary amperage and voltage monitoring at the Dry Electrostatic Precipitators of both furnaces were added so that these parametric ranges will continue to be used to monitor the effectiveness of such control equipment once the starch-based binder system is employed to replace the phenol/formaldehyde binder and the related conditions of 40 CFR 63.1383(c), Subpart NNN no longer apply.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

40 CFR Part 70
This applies to Title V sources.

6 NYCRR 202-1.2
This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6 NYCRR 202-1.3
This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may be also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212.4 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 212.4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible

Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 220-2.3 (a)
This citation required a reasonably available control technology (RACT) analysis to be submitted to the department by December 1, 2010 for emissions of oxides of nitrogen (NO_x) from the furnaces. The RACT analysis was to propose a RACT emission limit(s) and identify the procedures and monitoring equipment to be used to demonstrate compliance with the proposed RACT emission limit(s) to be expressed in pounds of NO_x per ton of glass produced. NOx RACT, as approved by the department, must be implemented by July 1, 2012. The facility is subject to this requirement because it is a glass plant that is a major facility of NOx emissions.

6 NYCRR 220-2.4 (a)

The owner or operator of a glass melting furnace located at a glass plant that meets the applicability requirements of section 220-2.1 must maintain a file of daily glass production rates. The production rates must be summarized monthly. Glass production records must be retained for at least five years following the date of such records and must be made available for inspection by the department during normal business hours.

6 NYCRR 220-2.4 (c)
This citation sets forth the requirements for installing, evaluating, operating, and maintaining the continuous emissions monitoring system (CEMS) which is required to measure NOx emissions from the glass melting furnaces.

6 NYCRR 220-2.4 (d)

Protocols, reports, summaries, schedules, and any other information required to be submitted to the department under provisions of this Subpart must be sent (in either hardcopy or electronically) as follows:

(1) one copy to the Division of Air Resources, New York State Department of Environmental Conservation, 625 Broadway, Albany, New York 12233; and

(2) one copy to the regional air pollution control engineer at the appropriate regional office of the department.

6 NYCRR 228-1.10
This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228-1.3 (a)
This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6 NYCRR 228-1.5 (a)
This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6 NYCRR 229.3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 231-11.2 (b)
This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c). These "reasonable possibility" record keeping requirements apply because for the starch-based binder change project, actual emissions projections were used instead of potential emissions when comparing future project resultant emissions to baseline actual emissions.

6 NYCRR 234.3 (a) (1) (i)
For packaging rotogravure, publication rotogravure or flexographic printing processes that use ink, coating or adhesive containing VOC must use inks that have a VOC content of 0.8 kilograms of VOC per kilogram of solids as applied or 0.16 kilograms of VOC per kilogram of ink, coating or adhesive as applied.

6 NYCRR 234.5
This regulation requires that a person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part.

6 NYCRR 234.6
This regulation specifies the following:

An owner or operator of a facility subject to this Part shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR 234.7
This regulation sets forth the record keeping requirements for facilities subject ot the reuqirements of Part 234.

6 NYCRR 234.8
This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

6 NYCRR Part 212
This regulations applies to process (versus combustion) sources.

6 NYCRR Part 249
This regulation restricts the emissions of visibility-impairing pollutants (NOx, SO2 and PM-10) by requiring the installation of Best Available Retrofit Technology (BART) on BART-eligible stationary sources to reduce regional haze and restore natural visibility conditions to Federal Class I areas. The facility has accepted emission limits (caps) in the permit on its BART-eligible stationary sources in order to otherwise avoid the requirements of this regulation.

6 NYCRR Subpart 201-7
Test

6 NYCRR Subpart 231-2
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County. The facility has capped (under 6 NYCRR Subpart 201-7) the past project from Subpart 231-2 applicability requirements by accepting limits on tons of glass pulled per year. These limits have been carried over from the initial Title V permit into this permit renewal/modification.

6 NYCRR Subpart 231-6
This Subpart applies to modifications to existing major facilities in non-attainment areas and attainment areas of the State within the Ozone Transport Region (OTR). The Owens Corning Insulating Systems - Feura Bush facility has capped (under 6 NYCRR Subpart 201-7) the starch-based binder system conversion project from these requirements by accepting monitoring limits on the tons of binder used per year so that the VOC emissions increase from the associated starch-based binder project will be limited to no more than 39 tons per year (tpy). When added to the two-year average baseline emissions of 59.78 tpy (from 2005-2006 facility emissions statements), the total VOC emissions from the affected process sources shall not exceed 98.78 tpy as a rolling 12-month average.

Non Applicability Analysis
List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR 60.680	Wool fiberglass insulation manufacturing plants

Reason: Currently, both the DM-1 and DM-2 manufacturing lines are not subject to 40 CFR 60, Supart PPP (40 CFR 60.680 or NSPS PPP) - Standard of Performance for Wool Fiberglass Insulation Manufacturing Plants. The proposed binder change project to a starch-based binder will not trigger the applicability of NSPS PPP for either the DM-1 or DM-2 manufacturing lines. Applicability of NSPS PPP is for rotary spin wool fiberglass insulation manufacturing lines that commence construction, modification or reconstruction after February 7, 1984. 40 DFR 60.14 defines modification as any physical change or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies, where the emission rate is required to be expressed as kg/hour. In other words, the NSPS modification provisions apply an hourly emissions rate test to determine whether an emissions increase results from a physical or operational change. Pursuant to longstanding USEPA interpretations, the emission rate before and after a physical or operational change is evaluated at each unit by comparing the hourly potential emissions under

current maximum capacity to hourly emissions at maximum capacity after the change.

The binder change project will not increase the hourly bare glass production rate of any of the affected manufacturing lines. A comparison by the facility of the standardized emission factor data applicable prior to the binder change with emission factor data obtained from stack tests performed during starch-based binder trials at the OCIS facility in Eloy, AZ demonstrates that the maximum hourly particulate matter emissions will not increase as a result of the binder change project. Therefore, both the DM-1 and DM-2 manufacturing lines will remain not subject to NSPS PPP.

U-00015/-/FG2	40 CFR 63.820	Printing and Publishing NESHAP-applicability

Reason: This standard covers wide web flexographic printing. Although the facility does use flexographic printing, it does not qualify as wide web. In all cases, the printing face is less than 18 inches wide.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification
Summary of monitoring activities at OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	41	record keeping/maintenance procedures
FACILITY	50	work practice involving specific operations
FACILITY	51	work practice involving specific operations
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
U-00002	92	monitoring of process or control device parameters as surrogate
U-00002	93	monitoring of process or control device parameters

		as surrogate
U-00003	95	monitoring of process or control device parameters as surrogate
U-00003	96	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ1SS	97	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ1SS	98	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ2SS	99	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ2SS	100	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ5SS	101	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ5SS	102	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ6SS	103	monitoring of process or control device parameters as surrogate
U-00003/-/FZ1/FZ6SS	104	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZ3SS	105	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZ3SS	106	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZ4SS	107	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZ4SS	108	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZEP1	109	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZEP1	110	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZEP2	111	monitoring of process or control device parameters as surrogate
U-00003/-/FZ2/FZEP2	112	monitoring of process or control device parameters as surrogate
U-00012	127	monitoring of process or control device parameters as surrogate
U-00012	128	monitoring of process or control device parameters as surrogate
U-00013/00017/FC2/DM2DB	130	record keeping/maintenance procedures
FACILITY	4-11	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	81	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	4-1	work practice involving specific operations
FACILITY	4-2	work practice involving specific operations
FACILITY	4-3	work practice involving specific operations
FACILITY	4-4	record keeping/maintenance procedures
FACILITY	4-5	record keeping/maintenance procedures
FACILITY	4-6	record keeping/maintenance procedures
FACILITY	4-7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
U-00001	86	record keeping/maintenance procedures
U-00002	87	work practice involving specific operations
U-00002	88	work practice involving specific operations
U-00002	89	intermittent emission testing
U-00003	94	intermittent emission testing
U-00008	119	intermittent emission testing
U-00009	120	record keeping/maintenance procedures

U-00010	121	record keeping/maintenance procedures
U-00011	4-12	record keeping/maintenance procedures
U-00012	122	intermittent emission testing
U-00012	123	work practice involving specific operations
U-00012	124	work practice involving specific operations
U-00017	131	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
U-00005/-/AA1	4-21	monitoring of process or control device parameters as surrogate
U-00010	138	record keeping/maintenance procedures
U-00015/-/AA2	4-22	monitoring of process or control device parameters as surrogate
FACILITY	29	record keeping/maintenance procedures
FACILITY	4-9	record keeping/maintenance procedures
FACILITY	31	intermittent emission testing
FACILITY	32	record keeping/maintenance procedures
FACILITY	4-14	work practice involving specific operations
FACILITY	4-15	record keeping/maintenance procedures
FACILITY	4-16	record keeping/maintenance procedures
FACILITY	4-17	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	33	work practice involving specific operations
FACILITY	34	record keeping/maintenance procedures
FACILITY	136	record keeping/maintenance procedures
FACILITY	36	work practice involving specific operations
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	monitoring of process or control device parameters as surrogate

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Basis for Monitoring

Capping from 6 NYCRR Part 249: BART - The facility has accepted emission limits (caps) in order to avoid applicability of Best Available Retrofit Technology (BART) requirements under 6 NYCRR Part 249. By incorporating these emission caps, the combined potential emissions from all BART-eligible units are restricted to less than 250 tons per year of each visibility impairing pollutant; i.e., nitrogen oxides (NOx), sulfur dioxide (SO2), and particulate matter less than 10 microns in diameter (PM-10). As a result, the facility is not subject to BART under Part 249. These emission caps apply to emission units U-00002, U-00003, U-00012, U-00013, and U-00014 which pertain to the glass furnaces and associated forming, curing, cooling, and smoke stripper sections of the two wool fiberglass insulation manufacturing lines. Operational changes to these units will not be necessary to comply with these annual emission limits as the actual emissions in combination from these units are already below the BART caps. Compliance with these emission caps will be established based on emission calculations performed on a monthly basis to determine the 12-month rolling average of emissions of each visibility impairing pollutant. The emission calculations, the procedures for which are outlined in the permit, will be based on source-specific emission factors which will be verified or reestablished once per permit term through stack testing.

6 NYCRR Subpart 220-2: Glass Plants - Conditions have been added to the permit in order for the facility to comply with the NOx Reasonably Available Control Technology (RACT) requirements for glass plants under 6 NYCRR Subpart 220-2. The existing furnace oxy-fuel firing control technology is already considered to be NOx RACT for each of the glass melting furnaces at the facility and, therefore, additional NOx control equipment will not be necessary to comply with Subpart 220-2. However, Subpart 220-2 also requires each glass furnace at the facility to meet a facility specific NOx emission limit in pounds of NOx per ton of glass pulled and requires the installation of a continuous emissions monitoring

system (CEMS) to demonstrate compliance with such emission limit. This permit modification sets forth the NOx emission limit and CEMS requirements for the glass furnaces. Note that each of the furnaces at the facility will initially be required to achieve a maximum NOx emission limit of 4.0 pounds NOx per ton of glass pulled on a block 24-hour basis. This limit is the Ozone Transport Comissions (OTC) guideline for fiberglass manufacturing plants and is also the limit proposed by the facility in its NOx RACT analysis dated November 2010. However, recognizing the uniqueness in design of glass manufacturing plants in New York State, Subpart 220-2 requires a facility-specific analysis which results in a NOx RACT limit most representative of how the particular facility is operating. Therefore, approval of the facility's NOx RACT analysis is conditioned upon the requirement that the facility establishes a more representative, facility-specific NOx emission limit in pounds NOx per ton of glass pulled on a 30-day rolling average basis for each furnace. As the permit specifies, this shall be based upon the collection of twelve consecutive months of NOx emissions CEMS data, beginning no later than 60 days following the commencement of operation of the required CEMS, in combination with the tracking of daily glass production rates. The facility will need to complete the establishment of such a facility-specific NOx RACT emission limit for each furnace and submit it to the department for approval within 30 days following the 12-month CEMS data collection period. Once approved by the department, the permit will be modified to reflect the more representative, facility-specific NOx emission limit.

<u>40 CFR Part 63, Subpart NNN, Determination of non-applicability to starch-based binder conversion</u> - The permit has been modified to remove existing conditions pertaining to 40 CFR Part 63, Subpart NNN which is the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wool Fiberglass Manufacturing. The most recent renewal and modification to the Title V permit on November 5, 2010 allowed the facility to convert its operations from a phenol-formaldehyde based binder to a non-phenol, non-formaldehyde starch-based binder system. With the completion of this binder system conversion in February 2011 for the DM1 production line and in September 2011 for the DM2 production line, the facility no longer uses phenol and formaldehyde binders. Therefore, consistent with a determination by the United States Environmental Protection Agency (USEPA) that the facility would no longer meet the definition of an affected facility under Subpart NNN upon completion of the starch-based binder system conversion, the facility is no longer subject to the Subpart NNN NESHAP requirements. Further explanation is covered under the facility specific requirements section of this permit review report.