

Owens Corning Comments on Proposed Title V Renewal Permit with BAAQMD Responses

OCIS Comment #	OCIS Comment	BAAQMD Response
1	Provide an explanation for the asterisk symbol for pollutants listed in parts 78.g through 78.k of permit condition 24873	The preamble to permit condition 24873 states " Note: Any condition that is preceded by an asterisk is not federally enforceable." The District has addressed OCIS' comment by amending part 78 of permit condition by providing the following statement: "With regards to phenol, formaldehyde, methanol, ammonia, and acetaldehyde cited above, the HRSA results discussed in part 81 of this permit condition will determine the frequency of periodic testing for the above TACs at sources S-2, S-3, S-4, S-20, S-21, and S-22 in accordance with part 80 of this permit condition."
2	Modify the units for combined PM10 limit for sources S-20, S-21, and S-22 contained in part 84 of permit condition 24873 in Table VII-B (page 133), Table VII-C (page 142), and Table VII-D (pages 151 and 152) from "117.81 tpy PM10/day" to "117.81 tpy".	The typo error in Table's VII-B, C, and D has been corrected per OCIS' suggestion.
3	Modify the monitoring requirement citation contained in permit condition 12672 pertaining to S-69 & S-70 in Table VII-L from "part 4" to "part 1".	Permit condition 12672 governed the operation of S-46, S-69 & S-70. S-46 no longer operates at OCIS. Therefore, S-46 was deleted from permit condition 12672 and the remaining parts of the permit condition were renumbered. Part 4 of the old permit condition is now part 1. The typo error in Table VII-L has been corrected per OCIS' suggestion.
4	Modify the type of limit (from VOC to POC), the monitoring requirement citation (from part 7 of permit condition 14391 to none), and the monitoring frequency (from P/M to P/E) in Table VII-Q (pages 176 & 177) for S-155 and S-156.	The pollutant emitted from the inkjet printers S-155 and S-156 is POC (and not VOC), and part 7 of permit condition 14391 is a recordkeeping requirement that would not assure if the inks used at the above printers contain POC < 5% by wt. Therefore, part 7 of permit condition has been deleted as the "Monitoring Requirement Citation" associated with part 2 of permit condition 14391, and references to "VOC" associated with permit condition 14391 have been changed to "POC". The District's rationale for the event based monitoring is to assure that compliant inks are used at the printers. Specifically, if there is any change in the ink formulation, ink type, or ink vendor/supplier, OCIS would have to maintain the appropriate lab records that would help demonstrate compliance with part 2 of permit condition 14391.
5	Modify the type of limit (from VOC to POC), the monitoring requirement citation (from part 6 of permit condition 12378 to none), and the monitoring frequency (from P/M to P/E) in Table VII-R (pages 177 & 178) for S-157 and S-158.	The pollutant emitted from the flexographic printers S-157 and S-158 is POC (and not VOC), and part 6 of permit condition 12378 is a recordkeeping requirement that would not assure if the inks used at the above printers contain POC < 10% by wt. Therefore, part 6 of permit condition has been deleted as the "Monitoring Requirement Citation" associated with part 2 of permit condition 12378, and references to "VOC" associated with permit condition 12378 have been changed to "POC". The District's rationale for the event based monitoring is to assure that compliant inks are used at the printers. Specifically, if there is any change in the ink formulation, ink type, or ink vendor/supplier, OCIS would maintain the appropriate lab records that would help demonstrate compliance with part 2 of permit condition 12378.

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6	Modify the "capacity" of S-167 in Table II-A (page 8) from "873 in3" to "674 in3".	The error in Table II-A has been corrected per OCIS' suggestion.
7	Delete Table VII-S (page 182) pertaining to S-163 "Maintenance Paint Shop Spray Booth".	The District deleted S-163 from the proposed permit because it qualified for the exemption under Regulation 2-1-119.2. With the exception of Table VII-S, all other references to S-163 were deleted from the proposed permit. Table VII-S has been deleted per OCIS' comment.
8	Remove regulatory references to 40 CFR 63, Subpart NNN (MACT NNN) pertaining to S-1 and S-19 in page 92.	Effective March 20, 2011, part 13 of permit condition 24873 precludes OCIS from using phenol-formaldehyde binder in wool fiberglass manufacturing operations at sources S-2, S-3, S-4, S-20, S-21, and S-22. OCIS current use of the starch-based binder at S-20 (and at S-2 in the future) means that the wool fiberglass product is no longer "bonded". Therefore, OCIS no longer manufactures a "bonded wool fiberglass insulation product". Because the product is no longer "bonded", OCIS' existing M & O line glass-melting furnaces (S-1 and S-19) and the rotary spin wool fiberglass manufacturing lines (S-2, S-3, S-4, S-20, S-21, and S-22) are no longer subject to the MACT NNN standards. In light of the above, regulatory references to MACT NNN pertaining to S-1 and S-19 have been deleted per OCIS' suggestion.
9	Delete sources S-33, S-149, and S-150 and related references to the above sources from Table II-A (pages 6 & 8), Table IV-G (page 66), permit condition 14277 (page 99), and Table IXA-D (page 194).	Analysis of the tank contents stored in sources S-149 and S-150 by the District's lab determined that the above storage tanks store aqueous solutions containing less than 1% by wt. VOC. Therefore, the above tanks (though included in the proposed permit as permitted sources), were found to be exempt per Regulation 2-1-123.2. Therefore, all references to the above tanks in the proposed permit will be deleted. The contents of S-33 "Process/Groundwater Storage Surge Tank", which currently does not contain appreciable amounts of rain water/storm water run off will be analyzed by District staff during the rainy months. For the interim, it is assumed that S-33 will most likely qualify for the exemption in Regulation 2-1-123.2. Therefore, all references to S-33 have been deleted. In the event the District's analysis of S-33's contents in the future determines it does not qualify for the above exemption, OCIS will have to re-permit the above tank as a new source under the NSR program. In addition to the above, OCIS would also have to submit a minor Title V revision application to the District to include it as a permitted source in its renewed Title V permit.