



State of Ohio Environmental Protection Agency

Northwest District Office

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Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

Re: Erie County
0322000017
CertainTeed Corporation
Stack Test
Notice of Violation/HPF

March 23, 2006

CERTIFIED MAIL

Mr. Ron Sanders
Environmental Affairs Manager
Roofing Products Group
CertainTeed Corporation
6075 High Ridge Rd.
Paso Robles, CA 93446

Dear Mr. Sanders:

The stack tests conducted on August 30 - September 2 and September 29-30, 2005, to quantify air contaminant emissions from asphalt shingle production lines 1 and 2 are being reviewed. The purpose of this letter is to summarize the testing results and information needed to complete our review, compare the results to existing permit limits, and indicate the company's status with regard to compliance with Ohio EPA air emissions regulations:

As indicated in the stack test report, we confirm the following data is accurate:

Critical Test Data
(In Three Run Averages)

Sampling Location	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
CVM Fume Filter Exhaust Stack No. 1	PM	0.18 lbs/hr	0.61 lbs/hr	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.07 lbs/hr inorganic: 0.18 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs*	2.18 lbs/hr	12.68 lbs/hr	██████ TPH	To Be Determined
	formaldehyde	0.0091 lbs/hr	To Be Determined	██████ TPH	To Be Determined
CVM Fume Filter Exhaust Stack No.2	PM	0.09 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.11 lbs/hr inorganic: 0.29 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	2.63 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0148 lbs/hr	To Be Determined	██████ TPH	To Be Determined

Sampling Location	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
Line No. 1 Main Baghouse Exhaust Stack	PM	0.13 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.10 lbs/hr inorganic: 0.35 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	0.60 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0076 lbs/hr	To Be Determined	██████ TPH	To Be Determined
Line No. 1 Cooling Section Exhaust Stack No. 1	PM	0.68 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.18 lbs/hr inorganic: 0.60 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGOs	0.61 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0068 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	methane	2.26 ppm	To Be Determined	██████ TPH	To Be Determined
Line No. 1 Cooling Section Exhaust Stack No. 2	PM	0.43 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.16 lbs/hr inorganic: 0.47 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGOs	0.31 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.002 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	methane	1.54 ppm	To Be Determined	██████ TPH	To Be Determined
Line No. 1 Cooling Section Exhaust Stack No. 3	PM	0.13 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.12 lbs/hr inorganic: 0.38 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGOs	0.20 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0011 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	methane	2.02 ppm	To Be Determined	██████ TPH	To Be Determined
Line No. 1 Secondary Cooling Section Exhaust Stack	PM	0.50 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.12 lbs/hr inorganic: 0.22 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGOs	0.28 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0021 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	methane	2.53 ppm	To Be Determined	██████ TPH	To Be Determined
Line No. 2 Main Baghouse Exhaust Stack	PM	0.55 lbs/hr	1.33 lbs/hr	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.10 lbs/hr inorganic: 0.34 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	1.61 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0284 lbs/hr	To Be Determined	██████ TPH	To Be Determined

Sampling Location	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
Line No. 2 Sealant Tanks and Applicator Internal Exhaust Stack	PM	0.03 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.01 lbs/hr inorganic: 0.01 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	0.09 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.000114 lbs/hr	To Be Determined	██████ TPH	To Be Determined
Flatbed HEAF Exhaust Stack	PM	0.03 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.018 lbs/hr inorganic: 0.023 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	0.38 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0002 lbs/hr	To Be Determined	██████ TPH	To Be Determined
Mini HEAF Exhaust Stack	PM	0.03 lbs/hr	0.06 lbs/hr	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.01 lbs/hr inorganic: 0.01 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	0.13 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.000194 lbs/hr	To Be Determined	██████ TPH	To Be Determined
Line No. 1 Hot Filler Surge Bin Baghouse Exhaust Stack	PM	0.28 lbs/hr	1.44 lbs/hr	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.0 lbs/hr inorganic: 0.012 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	0.14 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0004 lbs/hr	To Be Determined	██████ TPH	To Be Determined
Line No. 2 Hot Filler Baghouse Exhaust Stack	PM	6.1 lbs/hr	0.67 lbs/hr	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.07 lbs/hr inorganic: 0.14 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	2.77 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.063 lbs/hr	To Be Determined	██████ TPH	To Be Determined
Line No. 1 Filler Heater Baghouse Exhaust Stack	PM	0.66 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	PM (back half - Method 202)	organic: 0.022 lbs/hr inorganic: 0.045 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	TGNMOs	1.0 lbs/hr	To Be Determined	██████ TPH	To Be Determined
	formaldehyde	0.0033 lbs/hr	To Be Determined	██████ TPH	To Be Determined

*Total gaseous non-methane organic compounds

Based on the information above, current test results for Line No. 2 Hot Filler Baghouse Exhaust Stack (emissions unit P011) demonstrate non-compliance with current permit limits. Results show the actual emission rate of 6.1 lbs PM/hr exceeds its allowable limit of 0.67 lb PM/hr established in PTI #03-8992. This emissions rate (6.1 lbs PM/hr) at 8760 hours/yr also exceeds the PSD significance level of 25 tons PM per year. This exceedance is a violation of the PTI, 40 CFR Part 52, and ORC 3704.05.

The testing also confirmed organic compounds are being emitted from this and other sources. The company failed to indicate these emissions in previous permit applications which prevented the Director from making proper determinations in accordance with the provisions of OAC rule 3745-31-05. These violations were noted in the NOV letter to the company dated April 21, 2003, based on Potential to Emit (PTE) information submitted by the company.

The company's plan to correct the violations and permitting deficiencies is to obtain a PSD PTI for the facility. The Ohio EPA is currently still waiting for the company's re-submission of the facility-wide PTI application as indicated in our meeting at the facility on March 23, 2005, and subsequent May 6, 2005 letter. Until a PTI application is processed, the company remains out of compliance with Ohio EPA Air Pollution Control regulation OAC 3745-31 and 40 CFR Part 52 for all installed sources not permitted or permitted incorrectly. The company also still remains out of compliance with OAC 3745-77 for the entire facility for not submitting a Title V application, and 3745-78 for failure to pay Title V fees.

In order for Ohio EPA to complete it's review of the stack test reports, the company needs to submit the maximum process weight rate (PWR), in tons of asphalt per hour, for each line under the worst case operating scenario, and a summary of any additional information which the company deems important when evaluating the maximum process weight rate for the worst case operating scenario for each line. Without the information requested above, Ohio EPA cannot verify that the company has achieved maximum emissions as demonstrated by a worst case operating scenario for testing.

Additional information concerning the PTI application is summarized in Ohio EPA's letter dated May 6, 2005. Specifically, items 2, 3, 5, 6, and 7 remain to be addressed by the company. These include addressing PSD permitting according to the injunctive relief policy, addressing the proper grouping of emissions units at the facility, addressing air toxics modeling, making a final determination of the applicability of 40 CFR Part 60, Subpart UU to the emissions units at the facility, and addressing the odor issues associated with the operations at the facility. Because of these delays in submitting information, it is too late to process and issue a synthetic minor permit prior to the May 1, 2006 compliance date for the Asphalt Processing and Roofing Manufacturing MACT.

In order to expedite the process of bringing the facility into compliance, the company should submit a revised compliance plan, including the above information and PTI application as soon as possible, but no later than **April 21, 2006**. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. Additionally, failure to submit the above information in a timely manner will result in significantly higher penalties being incurred when the current enforcement case is resolved.

If you have any questions or would like to schedule a meeting to discuss the details of the PTI application, please contact Peggy Gill at (419) 373 -3113.

Sincerely,

Robert G. Teer
Division of Air Pollution Control

Peggy Gill
Division of Air Pollution Control

/csl

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