

Public Notice

DEQ Requests Comments on Owens Corning Roofing and Asphalt, LLC's (dba: Trumbull Asphalt) Proposed Air Quality Permit



State of Oregon
Department of
Environmental
Quality

Northwest Region
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600
Portland, OR 97232
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www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of Owens Corning Roofing and Asphalt, LLC's proposed air quality permit, known officially as Standard Air Contaminant Discharge Permit.

Summary

This permitting action is a Department Initiated Modification for Owens Corning Roofing and Asphalt, LLC, dba: Trumbull Asphalt. The purpose of the action is to modify the PM_{2.5} Plant Site Emission Limit from 26 tons per year to 84 tons per year. In 2013, DEQ inaccurately calculated PM_{2.5} emissions by using the incorrect PM_{2.5} fraction. The PM_{2.5} fraction is used to calculate PM_{2.5} emissions based on the PM₁₀ emission rate. This modification correctly calculates the PM_{2.5} Netting Basis and Source Specific Plant Site Emission Limit to be used for compliance determinations in the current Standard Air Contaminant Discharge permit. This action also includes the addition of greenhouse gases (GHGs) to the PSEL based on rule established in 2011. Finally, due to a March 1, 2023 rule change, this permitting action calculates a source specific Plant Site Emission Limit for PM/PM₁₀/PM_{2.5}/NO_x/CO/VOC/GHGs, thereby replacing the generic Plant Site Emission Limits.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

NWR AQ Permit Coordinator
700 NE Multnomah Street Ste 600
Portland, OR 97232

Written comments are due by **5 p.m., Monday, April 10, 2023**

About the facility

This permitting action is for Owens Corning Roofing and Asphalt, dba: Trumbull Asphalt. located at 3750 NW Yeon Ave., in Portland.

The permittee manufactures three types of

laminated) residential roofing, and laminated residential roofing. The facility was established prior to 1972. The primary pollutants released from the roofing manufacturing process include: Particulate Matter, Nitrogen Oxides, Carbon Monoxide, and Volatile Organic Compounds.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

How does DEQ monitor compliance with the permit requirements?

This permit would require Owens Corning Roofing and Asphalt, LLC to monitor pollutants using federally approved monitoring practices and standards. Owens Corning Roofing and Asphalt, LLC must report instances of excess emissions and must submit an annual report which includes operating parameters for demonstrating compliance with permit conditions. DEQ conducts compliance inspections to verify permit conditions are being met and reviews annual reports for actual emissions generated by the facility's overall operations.

What happens after the public comment period ends?

DEQ considers and responds to all comments received during the public comment period and may modify the proposed permit based on comments. If a facility meets all legal requirements, DEQ will issue the facility's air quality permit.

Where can I get more information?

Find out more and view this notice which includes the full permit and report drafts online

Translation and other formats

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)
800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

Notice issued: 3/3/2023
By: Louis Bivins
Permit No.: 26-1815-ST-01

at: or contact the NWR Permit Coordinator at:
Phone: 503-229-5582 or 800-452-4011
Fax: 503-229-6945
Email: nwraqpermits@deq.state.or.us

View the application and related documents in person at the DEQ office in Portland. For a review appointment, call the NWR Air Quality Permit Coordinator at: 503-229-5582 or 800-452-4011.

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit DEQ's [Civil Rights and Environmental Justice page](#).

Emissions limits

Criteria Pollutants: Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Particulate matter	96	96
Small particulate matter	96	96
Fine particulate matter	26	84
Nitrogen oxides	39	6
Carbon monoxide	99	30
Volatile organic compounds	64	64
Greenhouse Gases (CO _{2e})	N/A	7,300

For more information about criteria pollutants, go to: www.epa.gov/criteria-air-pollutants

Hazardous air pollutants:

Owens Corning Roofing and Asphalt, LLC, dba: Trumbull Asphalt, is not a major source of hazardous air pollutants, however EPA has determined that businesses similar to this facility, as a group, emit enough hazardous air pollutants to warrant regulation. Therefore, this source is subject to the following National Emission Standard for Hazardous Air Pollutants: AAAAAAA.



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
STANDARD
AIR CONTAMINANT DISCHARGE PERMIT

Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Owens Corning Roofing and Asphalt, LLC
dba: Trumbull Asphalt
3750 NW Yeon Avenue
Portland, OR 97210

INFORMATION RELIED UPON:

Application No.: 034597
Date Received: 02/11/2022

PLANT SITE LOCATION:

3750 NW Yeon Avenue
Portland, OR 97210

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Portland
Approval Date: 09/15/1995

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Lisa Ball, Northwest Region Air Quality Permit Manager

Date

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC/NAICS
Part B, 7	Asphalt felt or coating manufacturing.	2952/342122
Part C, 3	All sources electing to maintain the source's netting basis.	n/a

Addendum Number 1 Department Initiated Modification

In accordance with OAR 340-216-0040(3), Conditions 6.0 and 13.0 are the only changes, and now read as follows:

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6.0 PLANT SITE EMISSION LIMITS

6.1. Plant Site Emission Limits (PSEL)

The permittee must not cause or allow plant site emissions to exceed the following: [OAR 340-222-0041]

Pollutant	Limit	Units
PM	96	tons per year
PM ₁₀	96	
PM _{2.5}	84	
NO _x	6	
CO	30	
VOC	64	
GHGs (CO ₂ e)	7,300	

6.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

13.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Natural gas usage (Asphalt pre-heater (1), Hot oil heaters (3), and Filler heater (1))	PM	7.6	lb/MMcf	AP-42
	PM ₁₀	7.6	lb/MMcf	AP-42
	PM _{2.5}	7.6*	lb/MMcf	AP-42
	NO _x	100.0	lb/MMcf	AP-42
	CO	84.0	lb/MMcf	AP-42
	VOC	5.5	lb/MMcf	AP-42
	GHGs	120,730	lb/MMcf	AP-42
Asphalt coater	CO	3.63E-01	lb/ton	ARMA
	VOC	6.70E-02	lb/ton	ARMA
Sealant mix tank 1 and 2	CO	1.61E-03	lb/ton	ARMA
	VOC	4.42E-03	lb/ton	ARMA
Sealant extruder	PM	2.13E-01	lb/ton	ARMA
	PM ₁₀	2.13E-01	lb/ton	ARMA
	PM _{2.5}	1.66E-01**	lb/ton	AP-42
	CO	9.04E-04	lb/ton	ARMA
	VOC	4.31E-03	lb/ton	ARMA
MLA use tank	CO	2.3E-03	lb/ton	ARMA
	VOC	6.96E-03	lb/ton	ARMA
MLA applicator	CO	2.3E-03	lb/ton	ARMA
	VOC	3.3E-02	lb/ton	ARMA
MLA bulk storage tank 21	CO	1.24E-03	lb/ton	ARMA
	VOC	3.46E-02	lb/ton	ARMA
Laminate sealant use tank	CO	1.61E-03	lb/ton	ARMA
	VOC	4.42E-03	lb/ton	ARMA
Laminate sealant applicator	CO	9.04E-04	lb/ton	ARMA
	VOC	4.31E-03	lb/ton	ARMA

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Asphalt storage tanks 18 and 19	CO	8.19E-02	lb/ton	ARMA
	VOC	4.20E-01	lb/ton	ARMA
Bulk sealant tank 20	CO	1.21E-03	lb/ton	ARMA
	VOC	8.26E-03	lb/ton	ARMA
Fiber bed filter system (5)	PM	0.02	gr/dscf	Reg.
	PM ₁₀	0.02	gr/dscf	Reg.
	PM _{2.5}	0.02*	gr/dscf	Assumes PM ₁₀ = PM _{2.5}
Dust collector system (8)	PM	0.02	gr/dscf	Title V app. 5/98
	PM ₁₀	0.02	gr/dscf	Reg.
	PM _{2.5}	0.02*	gr/dscf	Assumes PM ₁₀ = PM _{2.5}
	VOC	3.0E-03	lb/ton	OC Linnton
Ink jet printer	VOC	1.56E-02	lb/ton	TV permit
Cooling section	PM	0.198	lb/ton	OC Linnton
	PM ₁₀	0.198	lb/ton	OC Linnton
	PM _{2.5}	0.154**	lb/ton	OC Linnton
	VOC	2.7E-02	lb/ton	OC Linnton
Bottom Loading	PM	5	lb/truck	AP-42
	PM ₁₀	5.0	lb/truck	OC Linnton
	PM _{2.5}	0.757***	lb/truck	AP-42
	CO	10.9	lb/truck	AP-42
	VOC	17.7	lb/truck	AP-42

ARMA – Asphalt Roofing Manufacturers’ Association

OC – Compiled source test results from Owens Corning

Reg. – Regulatory grain loading limit

* PM_{2.5} ratio of PM₁₀ emission factor = 1

** PM_{2.5} ratio of PM₁₀ emission factor = 0.78

*** PM_{2.5} ratio of PM₁₀ emission factor = 0.15



STANDARD AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Owens Corning Roofing and Asphalt, LLC
 3750 NW Yeon Avenue
 Portland, OR 97210

Source Information:

SIC	2952
NAICS	342122
EPA ICIS-Air ID	n/a

Source Categories (Table 1 Part, code)	B, 7 C, 3
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

FCE	n/a
Compliance schedule	n/a
Unassigned emissions	X
Emission credits	n/a
Special Conditions	n/a

Source test	X
COMS	n/a
CEMS	n/a
PEMS	n/a
Ambient monitoring	Method 22

Reporting Requirements

Annual report (due date)	February 15
Quarterly report (due dates)	n/a

Monthly report (due dates)	n/a
Excess emissions report	n/a
Other (semi-annual compliance report)	NESHAP 7A

Air Programs

Synthetic Minor (SM)	n/a
SM -80	n/a
NSPS (list subparts)	UU
NESHAP (list subparts)	AAAAAAA
CAO	n/a
NSR	n/a

PSD	n/a
GHG	n/a
RACT	n/a
TACT	n/a
Other (specify)	n/a

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PERMITTING

PERMITTEE IDENTIFICATION

1. Owens Corning Roofing and Asphalt, LLC
3750 NW Yeon Avenue
Portland, OR 97210

PERMITTING ACTION

2. This department initiated permitting action includes three separate modifications to the current air quality permit for Owens Corning Roofing and Asphalt, LLC (Owens):
 - a. Establish a greenhouse gas Plant Site Emission Limit (PSEL);
 - b. Correct the PM_{2.5} netting basis completed by DEQ in 2013; and
 - c. Establish a Source Specific PSEL for all pollutants above the de minimis level (See Attachment A at the end of this report).
3. Owens contacted DEQ on February 11, 2022, via email expressing concerns that the PSEL for PM_{2.5} was incorrectly established at 26 tons per year. Owens claims that when the initial PM_{2.5} netting basis calculations were completed in 2013, DEQ used the incorrect PM_{2.5} fraction to calculate the PM_{2.5} netting basis and PSEL. When the 2013 netting basis was completed, the average PM_{2.5} fraction was calculated at 0.315 across all PM₁₀ emitting sources, when the PM_{2.5} fraction should be approximately 87.5 percent of PM₁₀ emissions across all sources, resulting in a PM_{2.5} PSEL of 84 tons per year. Owens contracted Trinity Consultants (Trinity) to complete the PM_{2.5} netting basis analysis and calculations, which was submitted to DEQ. Owens believes that DEQ arbitrarily established the PM_{2.5} fractions based on facility wide PM₁₀ emissions instead of evaluating the PM_{2.5} fraction on an emission unit basis. The analysis shown below in paragraph 4 was reviewed and approved by DEQ to correct the previous permitting action.

GREENHOUSE GAS SOURCE SPECIFIC PSEL

4. This permitting action adds GHGs (CO_{2e}) to the PSEL in the issued air quality permit. GHG emissions became a regulated pollutant by DEQ in 2011 and Owens is required to calculate GHG emissions and report them if they equal or exceed 2,756 tons (2,500 metric tons) per year [OAR 340-215-0030(2)]. The GHG PSEL is set at a source specific PSEL of 7,300 tons per year (see Attachment A).

ESTABLISHING A PM_{2.5} NETTING BASIS

5. The resulting PM_{2.5} calculations and PM_{2.5} netting basis analysis from Trinity is presented below:
 - PM_{2.5} PSEL
 - PM_{2.5} emission rate 84.30 tons per year (rounded to 84 tons per year)
 - PM_{2.5} Netting basis (per DEQ guidance document and OAR 340-222-0046(1)(b))
 - Step 1
 - $R = \text{PM}_{2.5} \text{ PSEL} / \text{PM}_{10} \text{ PSEL}$
 - 84 tpy/96 tpy
 - **R = 0.875**
 - Step 2
 - PM_{2.5} Netting Basis = R * PM₁₀ Netting Basis
 - PM_{2.5} Netting Basis = 0.875 * 86 tons per year
 - **PM_{2.5} Netting Basis = 75.25 tons per year** (rounded to 75 tons per year)
 - True-up determination
 - **PM_{2.5} Netting Basis + 9 = 75 tons per year + 9 tons per year = 84 tons per year**
 - Because the PSEL (84 tons per year) is less than or equal to the PM_{2.5} Netting Basis + 9 (84 tons per year), no adjustment to the Netting Basis is needed.
6. DEQ completed a follow-up PM_{2.5} netting basis analysis in April 2022 and the results are presented below. First the PM₁₀ PTE is calculated:

EU ID	Annual combustion/usage	Annual combustion/usage units	Pollutant	Pollutant EF	EF Source	Emissions (tons per year)
2.3 - Asphalt preheater #3	51.53	MMscf/yr	PM ₁₀	7.6	AP-42	0.20
10.1 - Hot oil heater #1	5.57	MMscf/yr	PM ₁₀	7.6	AP-42	0.02
10.2 - Hot oil heater #2	10.74	MMscf/yr	PM ₁₀	7.6	AP-42	0.04
10.3 - Filler heater	38.65	MMscf/yr	PM ₁₀	7.6	AP-42	0.15
10.4 - Hot oil heater #3	12.88	MMscf/yr	PM ₁₀	7.6	AP-42	0.05
Sealant extruder	91,924	Lb/ton asphalt at coater	PM ₁₀	0.213	ARMA	9.79

EU ID	Annual combustion/usage	Annual combustion/usage units	Pollutant	Pollutant EF	EF Source	Emissions (tons per year)
Filter bed F-1	6,000	Scfm	PM ₁₀	0.02	Reg.	4.51
Filter bed F-2 MLA use tank, MLA applicator, laminate seal use tank, laminate sealant applicator	1,000	Scfm	PM ₁₀	0.02	Reg.	0.75
Filter bed F-3 MLA bulk storage tank #21	300	Scfm	PM ₁₀	0.02	Reg.	0.23
Filter bed F-4 asphalt storage tank #18 and 19	200	Scfm	PM ₁₀	0.02	Reg.	0.15
Filter bed F-5 sealant use tank sealant mix tanks 1 and 2	70	Scfm	PM ₁₀	0.02	Reg.	0.05
DC-1 upper surge hopper	750	Scfm	PM ₁₀	0.02	Reg.	0.56
DC-6 surface material minibins	28,600	Scfm	PM ₁₀	0.02	Reg.	21.47
DC-7 parting agent use bin	1,250	Scfm	PM ₁₀	0.02	Reg.	0.94
DC-8 parting agent silo	1,350	Scfm	PM ₁₀	0.02	Reg.	1.01
DC-2 mineral surfacing	9,000	Scfm	PM ₁₀	0.02	Reg.	6.76
DC-3 mineral surfacing	7,000	Scfm	PM ₁₀	0.02	Reg.	5.26
DC-4 limestone silo with filter	1,500	Scfm	PM ₁₀	0.02	Reg.	1.13
DC-5 limestone	750	Scfm	PM ₁₀	0.02	Reg.	0.56

EU ID	Annual combustion/usage	Annual combustion/usage units	Pollutant	Pollutant EF	EF Source	Emissions (tons per year)
silos with filter						
cooling section	702,420	lb/ton coated and surfaced mat	PM ₁₀	0.198	OC	42.08
bottom loading	50	lb/truck	PM ₁₀	5	Reg.	0.13
Total PM₁₀						95.83

7. PM₁₀ emissions are multiplied by PM_{2.5} fractions to calculate tpy PM_{2.5} emissions.

Emission unit	PM ₁₀ tpy	PM _{2.5} fraction (f)	PM _{2.5} fraction source	PM _{2.5} tpy
2.3 - Asphalt preheater #3	0.2	1	AP-42	0.20
10.1 - Hot oil heater #1	0.02	1	AP-42	0.02
10.2 - Hot oil heater #2	0.04	1	AP-42	0.04
10.3 - Filler heater	0.15	1	AP-42	0.15
10.4 - Hot oil heater #3	0.05	1	AP-42	0.05
Sealant extruder	9.79	0.78	AP-42	7.64
Filter bed F-1	4.51	1	Assumes PM ₁₀ = PM _{2.5}	4.51
Filter bed F-2 MLA use tank, MLA applicator, laminar seal use tank, laminar sealant applicator	0.75	1	Assumes PM ₁₀ = PM _{2.5}	0.75
Filter bed F-3 MLA bulk storage tank #21	0.23	1	Assumes PM ₁₀ = PM _{2.5}	0.23
Filter bed F-4 asphalt storage tank #18 and 19	0.15	1	Assumes PM ₁₀ = PM _{2.5}	0.15
Filter bed F-5 sealant use tank sealant mix tanks 1 and 2	0.05	1	Assumes PM ₁₀ = PM _{2.5}	0.05
DC-1 upper surge hopper	0.56	1	Assumes PM ₁₀ = PM _{2.5}	0.56
DC-6 surface material minibins	21.47	1	Assumes PM ₁₀ = PM _{2.5}	21.47
DC-7 parting agent use bin	0.94	1	Assumes PM ₁₀ = PM _{2.5}	0.94
DC-8 parting agent silo	1.01	1	Assumes PM ₁₀ = PM _{2.5}	1.01
DC-2 mineral surfacing	6.76	1	Assumes PM ₁₀ = PM _{2.5}	6.76

Emission unit	PM ₁₀ tpy	PM _{2.5} fraction (f)	PM _{2.5} fraction source	PM _{2.5} tpy
DC-3 mineral surfacing	5.26	1	Assumes PM ₁₀ = PM _{2.5} ?	5.26
DC-4 limestone silo with filter	1.13	1	Assumes PM ₁₀ = PM _{2.5}	1.13
DC-5 limestone silo with filter	0.56	1	Assumes PM ₁₀ = PM _{2.5}	0.56
cooling section	42.08	0.78	AP-42	32.82
bottom loading	0.13	0.15	AP-42	0.02
Total	95.84			84.32

ARMA – Asphalt Roofing Manufacturers’ Association
OC – Compiled source test results from Owens Corning
Reg. – Regulatory grain loading limit

SOURCE SPECIFIC PSEL

8. Proposed PSEL Information

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	136	106	106	96	96	n/a
PM ₁₀	86	86	86	96	96	n/a
PM _{2.5}	26	26	75	26	84	58
SO ₂	278	260	260	n/a	n/a	n/a
NO _x	79	64	64	39	6	-33
CO	201	79	79	99	30	-69
VOC	33	46	46	64	64	n/a
GHG (CO ₂ e)	n/a	n/a	n/a	n/a	7,300	7,300

- a. The baseline emission rate was established in previous permitting actions and there is no new information that effects the previous determination.
- b. In the 2009 permit renewal the netting basis for PM₁₀ was incorrectly calculated when the PM netting basis was updated. The correct previous and proposed netting basis for PM₁₀ is 86, not 106.
- c. For Standard ACDPs, the netting basis is equal to the baseline emission rate minus emission reductions required by rule plus emission increases approved in accordance with OAR 340, division 224 (NSR rules).
- d. The PM_{2.5} baseline emission rate was calculated as a ratio of PM₁₀ emissions. The total PM₁₀ emissions for the facility in 2019 was 61.39 tons and the total PM_{2.5} emissions were 18.96, a ratio of 0.31. The PM_{2.5} emissions were determined by multiplying the ratio of PM_{2.5} by PM₁₀ emissions. Following the

PM_{2.5} netting basis calculations, the new ratio of emissions is the projected annual PM_{2.5} emissions (84 tpy) divided by the projected PM₁₀ emissions (96 tpy) yielding a new ratio of 0.875.

- e. Based on 2023 rule changes, the PSELs for PM/PM₁₀/PM_{2.5}/NO_x/CO/VOC/GHGs are all set to a source specific PSEL based on facility operations (see Attachment A at the end of this Review Report).
- f. The basis for the PSEL can be found in Attachment A at the end of this document.
- g. The SO₂ PTE is below the de minimis rate of one ton per year and a PSEL is not required.
- h. The facility currently emits GHGs and adding a PSEL is not an increase in emissions, merely a recognition of the emissions.
- i. The PSEL is a federally enforceable limit on the potential to emit.

CONCLUSION

9. DEQ was able to verify the PM_{2.5} calculations based on the information prepared by Trinity and submitted by the source. DEQ calculated the PM_{2.5} netting basis by taking the PM₁₀ netting basis multiplied by the R factor (0.875) ($R = \text{PM}_{2.5} \text{ PSEL} / \text{PM}_{10} \text{ PSEL}$), equaling a PM_{2.5} netting basis of 75 tons per year. The calculated PM_{2.5} PSEL is 84 tons per year, which is less than the netting basis + SER so the PM_{2.5} PSEL would be 84 tons per year. Using 84 tons per year, then $84 - 75 = 9$, which is below the SER for PM_{2.5} so no True-up required, which is explained further below. The permit will have a PM_{2.5} PSEL of 84 tons per year and a netting basis of 75 tons per year. The current air quality permit does not contain unassigned emissions for PM₁₀ and therefore there will be no unassigned emissions for PM_{2.5}.
10. PM_{2.5} true up background from Internal Management Directive AQ-00-0015: The rule basis for the "PM_{2.5} true-up" is the definition of Netting Basis in OAR 340-200-0020: "Netting Basis" means the baseline emission rate MINUS any emission reductions required by rule, orders, or permit conditions required by the SIP or used to avoid SIP requirements, MINUS any unassigned emissions that are reduced from allowable under OAR 340-222-0045, MINUS any emission reduction credits transferred off site, PLUS any emission increases approved through the New Source Review regulations in OAR 340 division 224 MINUS any emissions reductions required by subsection (g) of this section.
 - (a) A netting basis will only be established for regulated pollutants subject to OAR 340 division 224 as specified in the definition of regulated pollutant.
 - (b) The initial PM_{2.5} netting basis and PSEL for a source that was permitted prior to May 1, 2011, will be established with the first permitting action issued after July 1, 2011, provided the permitting action involved a public notice period that began after July 1, 2011.

(A) The initial netting basis is the PM_{2.5} fraction of the PM₁₀ netting basis in effect on May 1, 2011. DEQ may increase the initial PM_{2.5} netting basis by up to 5 tons if necessary to avoid exceedance of the PM_{2.5} significant emission rate as of May 1, 2011.

PM_{2.5} has been indirectly regulated through PM₁₀ and total particulate matter (PM) for years. Because of this, DEQ is adding PM_{2.5} to the program in a manner that avoids imposing retroactive violations on sources who have complied with existing permitting requirements for particulate matter. The PM_{2.5} Significant Emission Rate (SER) is 10 tons per year (tpy), while the PM₁₀ SER is 15 tpy. If a source's PM_{2.5} fraction of PM₁₀ is close to or equal to one (meaning that most or all of the PM₁₀ is PM_{2.5}), it is possible for a source to have PM_{2.5} emissions greater than the PM_{2.5} netting basis by more than the SER.

Without a rule provision to address this situation, sources could retroactively violate the air quality analysis requirements of OAR 340-222-0041 or New Source Review requirements. Sources could also be required to satisfy those requirements for any future change, even if emissions did not increase. Subsection (b)(A) of the definition of Netting Basis, referred to as the "PM_{2.5} true-up", was adopted by the Environmental Quality Commission to avoid this situation. The PM_{2.5} true-up allows DEQ to establish a PM_{2.5} netting basis at the minimum level necessary so that the source's PM_{2.5} PSEL is less than the PM_{2.5} SER over the netting basis.

PUBLIC NOTICE

11. Pursuant to OAR 340-216-0066(4)(b)(B), issuance of modified Standard Air Contaminant Discharge Permits requires public notice in accordance with OAR 340-209-0030(3)(c), which requires DEQ to provide notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments. In addition, a hearing will be scheduled to allow interested persons to submit oral or written comments if DEQ receives written request for a hearing from ten persons, or from an organization representing at least ten persons, within 35 days of the mailing of the public notice. If a hearing is scheduled, DEQ will provide a minimum of 30-day notice for the hearing. **The public notice was emailed/mailed on: Friday, March 3, 2023 and the comment period will end on: Monday, April 10, 2023; unless a hearing is scheduled.**

ATTACHMENT A – EMISSION DETAIL SHEETS

12. Particulate Matter (PM)

Plant Site Emission Limit: Source Specific PSEL: Particulate Matter							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): PM
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)	PM	7.6	lb/MMscf	AP-42	119.37	MMscf/yr	0.45
Sealant Extruder	PM	0.213	lb/ton	ARMA	91,927	tons coating	9.8
Fiber Bed Filter System (# 1-5)	PM	0.02	gr/dscf	Regulatory Limit	7,570	scfm	5.68
Dust Collector System (# 1-8)	PM	0.02	gr/dscf	Revised 5/98 Title V app	50,200	scfm	37.69
Cooling Section	PM	0.198	lb/ton coated and surfaced mat	OC Linnton	425,000	tons coated mat	42.08
Bottom Loading	PM	5	lb/truck	AP-42	50	trucks/yr	0.13
						Total PM emissions (tpy)	95.82

ARMA – Asphalt Roofing Manufacturers’ Association
 OC – Compiled source test results from Owens Corning
 Reg. – Regulatory grain loading limit

13. Particulate Matter-10 microns (PM₁₀)

Plant Site Emission Limit: Source Specific PSEL: Particulate Matter 10 Microns							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): PM₁₀
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)	PM ₁₀	7.6	lb/MMcf	AP-42	119.37	MMcf	0.45
Sealant Extruder	PM ₁₀	0.213	lb/ton	ARMA	91,927	tons coating	9.79
Fiber Bed Filter System (# 1-5)	PM ₁₀	0.02	gr/dscf	Reg.	7.57E+03	dscf	5.68
Dust Collector System (# 1-8)	PM ₁₀	0.02	gr/dscf	Reg.	5.02E+04	dscf	37.69
Cooling Section	PM ₁₀	0.198	lb/ton	OC Linnton	425,000	tons shingles	42.08
Bottom Loading	PM ₁₀	5	lb/truck	OC Linnton	50	trucks	0.125
						Total PM₁₀ Emissions (tpy)	95.82

ARMA – Asphalt Roofing Manufacturers’ Association
 OC – Compiled source test results from Owens Corning
 Reg. – Regulatory grain loading limit

14. Particulate Matter-2.5 microns (PM_{2.5})

Plant Site Emission Limit: Source Specific PSEL: Particulate Matter 2.5 Microns							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): PM _{2.5}
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)*	PM _{2.5}	7.6	MMscf/yr	AP-42	119	MMscf	0.45
Sealant Extruder**	PM _{2.5}	0.166	lb/ton	AP-42	91,927	tons coating	7.63
Fiber Bed Filter System (# 1-5)*	PM _{2.5}	0.02	gr/dscf	Assumes PM ₁₀ = PM _{2.5}	7.57E+03	dscf	5.68
Dust Collector System (# 1-8)*	PM _{2.5}	0.02	gr/dscf	Assumes PM ₁₀ = PM _{2.5}	5.02E+04	dscf	37.69
Cooling Section**	PM _{2.5}	0.154	lb/ton coated and surfaced mat	OC Linnton	425,000	ton of coated and surfaced mat	32.73
Bottom Loading***	PM _{2.5}	0.757	lb/truck	AP-42	50	trucks/yr	0.02
						Total PM_{2.5} Emissions (tpy)	84.20

* Emission factor based on PM_{2.5} netting basis analysis. PM_{2.5} EF calculated by multiplying the PM₁₀ EF by 1.

** Emission factor based on PM_{2.5} netting basis analysis. PM_{2.5} EF calculated by multiplying the PM₁₀ EF by 0.78.

*** PM_{2.5} ratio of PM₁₀ emission factor = 0.15

ARMA – Asphalt Roofing Manufacturers’ Association

OC – Compiled source test results from Owens Corning

Reg. – Regulatory grain loading limit

15. Nitrogen Oxides (NO_x)

Plant Site Emission Limit: Source Specific PSEL: NO _x							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): NO _x
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)	NO _x	100	lb/MMscf	AP-42	119	MMscf/yr	5.97
						Total NO_x Emissions (tpy)	5.97

16. Carbon Monoxide (CO)

Plant Site Emission Limit: Source Specific PSEL: CO							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): CO
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)	CO	84	lb/MMscf	AP-42	119.37	MMscf/yr	5.01
Asphalt Coater	CO	0.363	lb/ton asphalt at coater	ARMA	91,927	tpy	16.68
Sealant Use Tank	CO	0.00161	lb/ton asphalt at coater	ARMA	91,927	tpy	0.07
Sealant Extruder	CO	0.000904	lb/ton asphalt at coater	ARMA	91,927	tpy	0.04
MLA Use Tank	CO	0.0023	lb/ton asphalt at coater	ARMA	91,927	tpy	0.11
MLA Applicator	CO	0.0023	lb/ton asphalt at coater	ARMA	91,927	tpy	0.11

Plant Site Emission Limit: Source Specific PSEL: CO							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): CO
Laminate Sealant Use Tank	CO	0.00161	lb/ton asphalt at coater	ARMA	91,927	tpy	0.07
Laminate Sealant Applicator	CO	0.000904	lb/ton asphalt at coater	ARMA	91,927	tpy	0.04
Sealant Mix Tank 1	CO	0.00161	lb/ton asphalt at coater	ARMA	91,927	tpy	0.07
Sealant Mix Tank 2	CO	0.00161	lb/ton asphalt at coater	ARMA	91,927	tpy	0.07
Asphalt Storage Tank 18	CO	0.0819	lb/ton asphalt at coater	ARMA	91,927	tpy	3.76
Asphalt Storage Tank 19	CO	0.0819	lb/ton asphalt at coater	ARMA	91,927	tpy	3.76
MLA Bulk Storage Tank 21	CO	0.00124	lb/ton asphalt at coater	ARMA	91,927	tpy	0.06
Bulk Sealant Storage Tank 20	CO	0.00121	lb/ton asphalt at coater	ARMA	91,927	tpy	0.06
Bottom Loading Operations	CO	10.9	lb/truck	AP-42	50	trucks/yr	0.27
						Total CO Emissions (tpy)	30.20

ARMA – Asphalt Roofing Manufacturers’ Association

17. Volatile Organic Compounds (VOC)

Plant Site Emission Limit: Source Specific PSEL: VOC							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): VOC
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)	VOC	5.500	lb/MMscf	AP-42	119.37	MMscf/yr	0.33
Asphalt Coater	VOC	0.067	lb/ton prod.	Source Test	397,103	tpy	13.30
Sealant Use Tank	VOC	0.004	lb/ton asphalt at coater	ARMA	91,927	tpy	0.20
Sealant Extruder	VOC	0.004	lb/ton asphalt at coater	ARMA	91,927	tpy	0.20
MLA Use Tank	VOC	0.007	lb/ton asphalt at coater	ARMA	91,927	tpy	0.32
MLA Applicator	VOC	0.033	lb/ton asphalt at coater	ARMA	91,927	tpy	1.53
Laminate Sealant Use Tank	VOC	0.004	lb/ton asphalt at coater	ARMA	91,927	tpy	0.20
Laminate Sealant Applicator	VOC	0.004	lb/ton asphalt at coater	ARMA	91,927	tpy	0.20
Sealant Mix Tank 1	VOC	0.004	lb/ton asphalt at coater	ARMA	91,927	tpy	0.20
Sealant Mix Tank 2	VOC	0.004	lb/ton asphalt at coater	ARMA	91,927	tpy	0.20

Plant Site Emission Limit: Source Specific PSEL: VOC							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): VOC
Asphalt Storage Tank 18	VOC	0.420	lb/ton asphalt at coater	ARMA	91,927	tpy	19.30
Asphalt Storage Tank 19	VOC	0.420	lb/ton asphalt at coater	ARMA	91,927	tpy	19.30
MLA Bulk Storage Tank 21	VOC	0.035	lb/ton asphalt at coater	ARMA	91,927	tpy	1.59
Bulk Sealant Storage Tank 20	VOC	0.008	lb/ton asphalt at coater	ARMA	91,927	tpy	0.38
Dust Collector System (# 1-8)	VOC	0.003	lb/ton asphalt at coater	OC Linnton	91,927	tpy	0.14
Ink Jet Printer	VOC	0.016	lb/ton	TV Permit	5	tpy	0.00004
Cooling Section	VOC	0.028	lb/ton coated & surfaced mat	OC Linnton	425,000	tpy	5.89
Bottom Loading	VOC	17.700	lb/truck	AP-42	50	trucks/yr	0.44
						Total VOC Emissions (tpy)	63.74

ARMA – Asphalt Roofing Manufacturers’ Association
 OC – Compiled source test results from Owens Corning

18. Greenhouse Gas (GHG)

Plant Site Emission Limit: Source Specific PSEL: GHGs							
Emission Device or Activity	Pollutant	Emission Factor (EF)	EF Units	EF Reference	Process Production	Units	Pollutant Emissions (tons per year): GHG
Natural Gas Usage (asphalt preheater #3, hot oil heater #1, 2, and 3)	GHG	120,730	lb/MMscf	AP-42	119.37	MMscf/yr	7205.77
						Total GHG Emissions (tpy)	7205.77