

ATTACHEMENT B:

**THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT (“DISTRICT”)
RESPONSES TO COMMENTS SUBMITTED BY OWENS CORNING
ON THE PROPOSED MAJOR FACILITY REVIEW PERMIT FOR SITE #A0041.**

Permit Issuance Year: 2003

Comment #	Owens Corning Comment	Districts Response
1	In Table IIB, footnote 2 is specifically noted for control device A-34 and should also be noted for control devices A-35 and A-38.	The Final Major Facility Review Permit has been revised to incorporate footnotes 3 and 4 for control devices A-35 and A-38.
2	In part 11 of Permit Condition 16834, the requirement should be to maintain the batch wetting water flow rate for each furnace at a <i>minimum</i> of 0.3 gpm. A limit of exactly 0.3 gpm does not allow for flows that would be above this rate. Flows higher than 0.3 gpm have no potential to increase particulate emissions from the melters.	Language similar to that proposed by Owens Corning has been incorporated into Part 11 of Permit Condition 16834 in the Final Major Facility Review Permit.
3	There is a requirement to insure that the molten glass processing rate for M Line, comprised of sources S-2, S-3 and S-4, and O Line, comprised of sources S-20, S-21 and S-22, does not exceed 6.0 tons per hour and 135 tons per day. This stipulation appears in Table II-A, part 13 of Permit Condition 20565, part 7 of Permit Condition 20566, Table VII-B, Table VII-C and Table VII-D in response to an earlier comment/response by Owens	The daily molten glass-processing rate for sources S-2, S-3, S-4, S-20, S-21 and S-22 has been changed from 135 TPD to 144 TPD in the Final Major Facility Review Permit.

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	<p>Corning that M and O Line <i>may</i> be capable of processing no more than 135 tons per day of molten glass into insulation products. This was evidently a misleading choice of words on the part of Owens Corning and the pertinent Permit Conditions and Tables should be changed to note that the plant's two lines can process as much as 144 tons per day of molten glass.</p> <p>The original August, 1977 authority to construct and permit to operate applications' Data Form Gs for the forming, curing and cooling operations on M and O Line all listed total throughputs at maximum operating rates of ~6 tons per hour. Since it is not practical, or good operating practice, to ramp the upstream furnace's molten glass output up or down several times during any 24 hour period this value essentially equates to ~144 tons per day. While it is true that the manufacturing process and finished product properties of <i>some</i> products can limit a Line's molten glass utilization to ~135 tons per day, it is equally true that each Line, in their current configuration, can process ~144 tons per day of molten glass when they are employed in the manufacture of certain other products.</p>	
4	Part 5 of Permit Condition 20565 requires that the incinerators on sources S-3 and S-21 be inspected once per month. The Permit Evaluation and Statement of Basis does not address this monthly inspection requirement, as	The monthly incinerator inspection requirement in Part 5 of Permit Condition 20565 has been replaced with an annual incinerator inspection requirement in the Final Major Facility Review Permit.

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	such no explanation is available as to why the District is including this requirement in the permit. Owens Corning again requests that this inspection frequency be reduced to once per year to align with the requirements of 40 CFR 63 Subpart NNN [Section 1383(g)(2)] unless the District stipulates that a monthly inspection that does not include the incinerator internals (burners, refractory, heat exchanger tubes, etc.) will be acceptable.	
5	In order to acknowledge that there could be alternative test methods for product LOI and Density, the pertinent entries in Table VIII for the <i>Applicable Requirements</i> of 40 CFR 63.1382(a)(2)(i) should, under <i>Applicable Test Methods</i> , both include the ending phrase, "or alternatives approved by U.S. EPA". at the end of the 2nd and 4th to last entries in Table VIII.	The Final Major Facility Review Permit has been revised to incorporate language similar to that proposed by Owens Corning at the end of the 2nd and 4th to last entries in Table VIII.
6	There is a reference to 40 CFR 63 Subpart GG in part 8 of Permit condition 16834 and in Table IV-A. Owens Corning believes that this reference should be changed to 40 CFR 63 Subpart NNN.	The references to 40 CFR 63 Subpart GG in part 8 of Permit Condition 16834 and Table IV-A has been changed to 40 CFR 63 Subpart NNN in the Final Major Facility Review Permit.
7	There is a requirement to conduct a District-approved source test for formaldehyde emissions from S-2 and S-20 implied in Table VII-B, but no mention of this is made in part 9 of Permit Condition 25065. These two entries should be consistent.	The formaldehyde emission limit of 1.2 lb/ton of glass pulled in 40 CFR 63 Subpart NNN pertains to each existing rotary spin manufacturing line. The rotary spin manufacturing line is a combination of the forming, curing and cooling sections. Owens Corning has two rotary spin manufacturing lines i.e.

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		<p>“M” and “O”.</p> <p>Permit Condition 20565 governs the operation of the “M” and “O” forming and curing sections i.e. sources 2, 3, 20 and 21. The “M” and “O” line forming section formaldehyde emissions (sources 2 and 20) are unabated, whereas incinerators A-5 & A-6 and A-25 abate the “M” and “O” line curing section (sources 3 and 21) emissions.</p> <p>The first line in Part 9 of Permit Condition 20565 states: ”In order to demonstrate compliance with the formaldehyde emission limit of 1.2 pounds per ton of glass pulled per rotary spin manufacturing line in 40 CFR Part 63, Subpart NNN, the owner/operator shall perform a District approved source test on the “M” Charge Incinerator (A-5), “M” Discharge Incinerator (A-6) and “O” Oven Incinerator (A-25) once every five years, in accordance with the District’s Manual of Procedures.”</p> <p>In light of the facility’s comment, the first line in Part 9 of Permit Condition 20565 in the Final Major Facility Review Permit has been revised as follows: ”In order to demonstrate compliance with the formaldehyde emission limit of 1.2 pounds per ton</p>

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		of glass pulled per rotary spin manufacturing line in 40 CFR Part 63, Subpart NNN, the owner/operator of sources S-2, S-3, S-20 and S-21, shall perform a District approved source test on the “M” Charge Incinerator (A-5), “M” Discharge Incinerator (A-6) and “O” Oven Incinerator (A-25) once every five years, in accordance with the District’s Manual of Procedures.”
8	The entries in Table II-B which refer to abatement devices, A-41, envelope dry filters, on S-61 and S-62, should be deleted. S-61 and S-62 feature only abatement devices A-40, penclones, which are already mentioned in Table II-B.	The District has modified the Final Major Facility Review Permit to exclude any references to A-41.