STATE OF MINNESOTA
MINNESOTA POLLUTION CONTROL AGENCY

In the Matter of GAF Building Materials Corporation

Proceedings to Develop
and Implement a State Implementation
Plan for Twin Cities Sulfur Dioxide
Nonattainment Area to Demonstrate,
Attain and Maintain Compliance with the
National Ambient Air Quality Standards
for Sulfur Dioxide as Required by Clean
Air Act Sections 110, 172 and 191,
42 U.S.C. §§ 7410, 7502 and 7514.

AMENDMENT TWO TO
FINDINGS AND ORDER

The Minnesota Pollution Control Agency (MPCA), being fully advised in the premises, hereby adopts this Amendment Two to Findings and Order (Order) dated May 27, 1992. The Order has been amended, and as amended, is in effect today. This Amendment Two consists of deletions shown in overstrike type and additions shown in underlined type. Amendment Two shall become effective on the date it is executed by the MPCA Air Quality Program Development and Air Analysis Section Manager. Except as expressly amended herein, all provisions of the Order and Amendment One remain unchanged and in full force and effect.

1. Amendment Two authorizes the following revision to Part I.C.2. of the Order:

Part I.C.2.:
Fuel Restrictions. The Company is authorized to burn natural gas as the primary fuel source and No. 6 fuel oil, with or without knockout oil[1] as the backup fuel source in the Emission Units described in I.B. The sulfur content of No. 6 fuel oil~~, asphalt~~ and knockout oil shall not exceed 1.5 percent by weight.

2. Amendment Two authorizes the following revision to Part I.D. of the Order:

Part I.D.:
Demonstration of Compliance with Emission Limitations. The Company shall demonstrate compliance with sulfur dioxide emission limitation requirements of Part I.B. of this Order by sampling in accordance with the method set forth in section I.E.2.a. (as amended) and by obtaining and maintaining a No. 6 fuel oil supplier certification ~~and an asphalt supplier certification~~ from the fuel oil ~~and asphalt~~ suppliers for each shipment of fuel oil ~~and asphalt~~ delivered to the Facility. Each fuel oil ~~and asphalt~~ supplier's certification shall include the following information:

1. The name of the supplier;
2. The location of where the sample was drawn for analysis to determine the sulfur content of the fuel oil ~~or asphalt~~. Specifically the certification shall include whether each

shipment was sampled as delivered to the Facility, or whether the sample was drawn from the storage tanks at the fuel oil supplier's ~~or oil refiner's~~ facility, or other location;

3. The sulfur content of the No. 6 fuel oil ~~or the asphalt~~ from which the shipment came;

4. The method used to determine the sulfur content which shall be ASTM Method D-1552 for fuel oil and ~~ASTM Method D-270 for asphalt~~ ASTM Method D-4294-90 for the fuel oil/knockout oil blend or other EPA approved ASTM methods as listed in 40 CFR, Part 60, Appendix A, Method 19, § 5.2.2; and

3. Amendment Two authorizes the following revision to Part I.E.2 of the Order:

Part I.E.2.:

~~On a weekly basis, when oil is being used as a fuel, the Company shall sample and analyze the mixture of No. 6 fuel oil and knockout oil at the burner inlet to determine the sulfur content in accordance with ASTM Method D-1552 or another EPA approved ASTM method (as listed in 40 CFR, Part 60, Appendix A, Method 19, § 5.2.2), and the heating value (mmBtu/gallon) in accordance with ASTM Method D-240. If, after six months the data demonstrates sulfur content to be less than 1.3 percent, the Company shall decrease the fuel oil mixture sampling to a monthly basis.~~

a. On a daily basis when oil is being used as a fuel, the Company shall sample and analyze the mixture of No. 6 fuel oil and knockout oil at a point between the fuel oil storage tank and the combustion units to determine the percent sulfur content of that blend in accordance with ASTM Method D-4294-90 or another EPA approved ASTM method (as listed in 40 CFR, Part 60, Appendix A, Method 19, § 5.2.2.

b. On a weekly basis when oil is being used a as fuel, the Company shall sample and analyze the mixture of No. 6 fuel oil and knockout oil at a point between the fuel oil storage tank and the combustion units to determine the heating value of that fuel mixture in mmBtu/gallon in accordance with ASTM Method D-240 EPA approved ASTM method (as listed in 40 CFR, Part 60, Appendix A, Method 19, § 5.2.2..

4. Amendment Two authorizes the following revision to Part IV.B.2.a. of the Order:

Part IV.B.2.a.:

Sulfur Dioxide Emissions and Operating Records. The Company shall generate and maintain records containing information to demonstrate compliance with the emission limitation and operating requirements specified in Part I. of this Order. In order to demonstrate compliance with the emission limitation (Part I.B.), the Company shall retain the following records: The percent by weight of sulfur in the No. 6 fuel oil, mixture of No. 6 fuel oil and knockout oil, ~~and asphalt,~~ and the heating value of No. 6 fuel oil and No. 6 fuel oil mixed with knockout oil (in million British Thermal Units per gallon). In order to demonstrate compliance with the capacity limitation (Part I.C.1.), the Company shall retain records on the number of gallons of the No. 6 fuel oil and the mixture of No. 6 fuel oil and knockout oil burned on an hourly basis for each emission unit. In order to demonstrate compliance with the sulfur content restrictions (Part I.C.2.), the Company shall retain ~~monthly records on the amount of~~ records on the percent sulfur

by weight of sulfur in the No. 6 fuel oil burned and the mixture of No. 6 fuel oil and knockout oil burned. The records shall be signed by the person entering information into the record. To summarize, at a minimum, the Ceompany shall retain records containing the following information:

1) The fuel oil ~~and asphalt~~ supplier's certifications containing the information listed in Part I.D. of this Order;

2) The date of each fuel oil ~~or asphalt~~ delivery cross-referenced to the certification accompanying that delivery;

IT IS SO ORDERED BY THE MINNESOTA POLLUTION CONTROL AGENCY

Date: 9/18/97

J. David Thornton, Section Manager
Program Development and Air Analysis Section
Air Quality Division