



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
SUMMIT COUNTY
Application No: 16-01798

CERTIFIED MAIL

DATE: 9/28/2000

PPG Industries Inc Barberton Plant
Irene Raiber
PO Box 31 4829 Fairland Road
Barberton, OH 44203

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 9/28/2000
Effective Date: 9/28/2000**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-01798

Application Number: **16-01798**
APS Premise Number: **1677020009**
Permit Fee: **\$0**
Name of Facility: **PPG Industries Inc Barberton Plant**
Person to Contact: **Irene Raiber**
Address: **PO Box 31 4829 Fairland Road
Barberton, OH 44203**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4829 Fairland Rd
Barberton, OHIO**

Description of modification:
Modification to PTI #16-01798 issued 07/01/98 and modified on 4/14/99 to correct Air Toxics language.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: 1677020009

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: 1677020009

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

5

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: **1677020009**

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: **1677020009**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **PPG Industries Inc Barberton Plant** located in **SUMMIT** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P108 (Mod)	Teslin Line #1 - mixer, blender, extruder, extractor, drying oven.	See Additional Special Terms and Conditions. Compliance with Ohio EPA "Air Toxics Policy".	3745-31-05 3745-17-07 3745-17-11 3745-21-07(G)(2)	8 pounds/hour and 40 pounds/day, or reduce OC emissions by 90 percent; total allowable vent emissions from P110-S01 shall not exceed 1.1 pounds/hour or 5.0 TPY VOC ¹ . Fugitive emissions from source P108 are limited to 33.55 TPY VOC. 5 percent opacity as a six-minute average at stack P108-S01. 3.53 pounds/hour particulate matter at stack P108-S01 ² .

15.5
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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	35.04
PM	15.5

- ¹ Total allowable vent emissions from P110-S01 represent combined vent emissions from P108 and P110.
- ² Total allowable particulate emissions from P108-S01 are for material handling operations serving both Teslin lines, P108 and P110, and reflect the combined level of allowable emissions authorized in PTI numbers 16-506 and 16-01776.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: **1677020009**

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Akron Air Pollution Control, 146 South High Street, Room 904, Akron, Ohio 44308.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Akron Air Pollution Control, 146 South High Street, Room 904, Akron, Ohio 44308.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: 1677020009

1. Maximum process weight rate for this emissions unit was developed based upon the current product mix. Prior to changing to a heavier dry material to be handled in this emissions unit, the permittee shall notify the Akron RAQMD and submit an application if a permit modification is required.
2. The mixer shall be adequately enclosed and shall vent to a fabric filter.
3. The calendar rolls and extruder shall be equipped with a Smog Hog or equivalent device to control any particulate emissions generated from plastic sheet formation.
4. The extruder, oil separator, drying oven, and TCE stripping unit shall be vented to a carbon adsorption unit to control organic emissions.
5. Pursuant to OAC rule 3745-31-05, the best available technology determination also requires compliance with the Ohio EPA Air Toxics Policy.

A. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 6 inches of water while the emissions unit is in operation.
2. The total mass steam flow rate from the carbon adsorber, for any carbon bed regeneration cycle, shall not be more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

B. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), and any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall operate and maintain a continuous monitor and recorder which measures and records the steam flow rate from the carbon adsorber serving P108. The monitor and recorder

shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. the total mass steam flow rate from the carbon adsorber during each carbon bed regeneration cycle; and,
 - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit(s).
3. The permittee shall annually calculate the fugitive emissions from the emissions unit. These emissions shall be recorded and combined with the stack emissions to demonstrate compliance with OAC rule 3745-21-07(G)(2).

C. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that any day during which the pressure drop across the baghouse was less than 0.5 inch or more than 6 inches of water while the emissions unit was in operation.
2. The permittee shall submit total mass steam flow rate deviation (excursion) reports that identify all carbon bed regeneration cycles during which the total mass flow steam rates was more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emissions test that demonstrated the emissions unit was in compliance.
3. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or record keeping information shall be submitted to the Akron Air Pollution Control Agency; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These

quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. The permittee shall submit annual reports which contain the annual fugitive emissions and demonstrate that combined emissions did not exceed the allowable mass emission limitation in OAC rule 3745-21-07(G)(2). These reports shall be submitted by April 30, and will contain information from the previous calendar year.

D. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emission testing shall be conducted every 2.5 years;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for organic compounds;
 - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 18 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; and,
 - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron Air Pollution Control Agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Air Pollution Control Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron Air Pollution Control Agency's refusal to accept the results of the emission test(s).
3. Personnel from the Akron Air Pollution Control Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emissions test(s) shall be signed by the

person or persons responsible for the tests and submitted to the Akron Air Pollution Control Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron Air Pollution Control Agency.

5. Compliance with the emission limitation(s) in Permit to Install shall be 16-01776 determined in accordance with the following method(s):

a. Emission Limitation

1.1 lbs/hr OC (vent emissions from P110-S01 stack)
5.0 TPY OC (vent emissions from P110-S01 stack)

Applicable Compliance Method

Compliance with the allowable mass emission rate for OC shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18 and the procedures in OAC rule 3745-21-10(C).

b. Emission Limitation

5 percent opacity as a 6-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

c. Emission Limitation

3.53 lbs/hr particulate matter (P108-S01 stack)
15.5 TPY particulate matter (P108-S01 stack)

Applicable Compliance Method

If required, compliance shall be demonstrated through emissions testing in accordance with Method 5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation

8.0 lbs/hr OC and 40.0 lbs/day, unless reduced by 90 percent (combined stack and fugitive emissions)

PPG Industries Inc Barberton Plant
PTI Application: 16-01798
Modification Issued: 9/28/2000

Facility ID: **1677020009**

Applicable Compliance Method

Stack Emissions: Compliance with the allowable mass emission rate for OC shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18 and the procedures in OAC rule 3745-21-10(C).

Fugitive Emissions: Compliance shall be demonstrated by an annual material balance calculation to determine fugitive losses.