



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
SUMMIT COUNTY
Application No: 16-01776

DATE: 1/22/2002

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: 1/22/2002
Effective Date: 1/22/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-01776

Application Number: **16-01776**
APS Premise Number: **1677020009**
Permit Fee: **\$200**
Name of Facility: **PPG Industries Inc Barberton Plant Raiber**
Person to Contact: **Irene**
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 of terms and conditions of PTI 16-01776 issued on 07/01/98 and modified on 4/04/99 and again on 9/21/00.

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

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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 emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or 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.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted

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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.

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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<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>
P110 (Mod)	Teslin Line #2 - mixer, blender, extruder, extractor, drying oven.	See additional terms and conditions. Compliance with Ohio EPA "Air Toxics Policy."	3745-31-05 3745-17-07 3745-17-11 3745-21-07(G)(2)	2.49 lbs/hr particulate matter. 10.9 TPY particulate matter. (Based on 950 lbs/hr maximum solid process weight.) 5% opacity as a six-minute average. 0.8 lb/hr organic compounds 3.5 TPY organic compounds (vent emissions from P110 - SO1 stack.) 8 lbs/hr organic compounds 40 lbs/day organic compounds, unless reduced by 90%.

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(Combined stack and fugitive emissions.)

Fugitive emissions are 191 lbs/day organic compounds, 33.8 TPY organic compounds.

**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Organic compounds	38.4
Particulate matter	10.9

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

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Director, or any representative of the Director, for review during normal business hours.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

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 shall 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.

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 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 inches or more than 6 inches of water while the emissions unit was in operation.
2. 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; 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. 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.)
3. 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.
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. 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's refusal to accept the results of the emission test(s).
3. Personnel from the Akron Air Pollution Control 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 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.
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:

0.8 lb/hr OC (vent emissions from P110-S01 stack)
3.5 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% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)
 - c. Emission Limitation:

2.49 lbs/hr particulate matter
10.9 TPY particulate matter

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% (combined stack and fugitive emissions)

Applicable Compliance Method:

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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.