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Facility Name: **PPG Industries, Inc.**

Application Number: **13-2970**

Date: **Draft PTI (Date will be entered upon final issuance)**

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.

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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.

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.

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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.

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.

Facility Name: **PPG Industries, Inc.**Application Number: **13-2970**Date: **Draft PTI (Date will be entered upon final issuance)**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **PPG Industries, Inc.** located in **Cuyahoga** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P136	Bldg. 25 five liter closed grinding mill and ancillary portable mixing tank. Co. ID is 25-S-5-L Drais Eirich-Gruppe and 25-HM-A1.	The BAT determination for this emissions unit is*	3745-31-05 3745-21-09 (MM)(2) 3745-15-07	0.772 pound VOC/hour; 3.38 TPY VOC **
P137	Bldg. 25 dual 200 liter closed grinding mill and ancillary portable mixing tank. Co. ID is 25-PM-D200-3 and 25-HM-A2.	The BAT determination for this emissions unit is* Compliance with the Air Toxic Policy	3745-31-05 3745-21-09 (MM)(2) 3745-15-07	1.54 pounds VOC/hour; 6.75 TPY VOC **
P138	Bldg. 25 closed dual 90 liter grinding mill and ancillary portable mixing tank. Co. ID is 25-PM-D90-1 and 25-HM-A3.	The BAT determination for this emissions unit is* Compliance with the Air Toxic Policy	3745-31-05 3745-21-09 (MM)(2) 3745-15-07	1.54 pounds VOC/hour; 6.75 TPY VOC **

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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>
P139	Bldg. 25 closed single 60 liter grinding mill and ancillary portable mixing tank. Co. ID is 25-PM-S60-1 and 25-HM-A4.	The BAT determination for this emissions unit is* Compliance with the Air Toxic Policy	3745-31-05 3745-21-09 (MM)(2) 3745-15-07	1.23 pounds VOC/hour; 5.39 TPY VOC **
P140	Bldg. 25 closed single 45 liter grinding mill and ancillary portable mixing tank. Co. ID is 25-PM-45-1 and 25-HM-A5.	The BAT determination for this emissions unit is* Compliance with the Air Toxic Policy	3745-31-05 3745-21-09 (MM)(2) 3745-15-07	0.925 pound VOC/hour; 4.05 TPY VOC **

* that the emissions from the source or emissions unit shall be vented to a control system which shall maintain compliance with a minimum control efficiency of ninety eight percent (98%) by weight for the VOC emissions, a maximum outlet VOC concentration of twenty parts per million by volume (20 ppmv) on dry basis, or a minimum incineration temperature of one thousand five hundred degrees Fahrenheit. For a control system that employs incineration, the incineration temperature shall be determined by means of a continuous measurement and recording of such temperature. The permittee shall maintain the records on the emission control system for a period of three years. Further, the ancillary portable mixing tank containing a paint material shall be equipped with a cover or lid that completely covers the opening of the tank, except for an opening no larger than necessary to allow for safe clearance for the mixer's shaft. Such tank shall be covered at all times in which the tank contains a paint material except when operator access is necessary to add ingredients or take samples.

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** The emissions unit identified in this permit shall not cause a public nuisance in violation of OAC rule 3745-15-07.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	26.36

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

<u>Source</u>	<u>Pollutant(s)</u>
P136, P137, P138, P139 and P140	VOC

- D. Tests shall include a determination of the uncontrolled mass rate of emissions.

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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 **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

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

I. Emissions Unit P136

A. Applicable Emission Limitation and/or Control Requirements

The VOC emission limitations for emissions unit P136, five liter closed grinding mill and ancillary portable mixing tank is identified in the Air Emission Summary Section of this Permit to Install (PTI).

B. Operational Restrictions

1. The VOC emissions from this emissions unit included within the paint manufacturing operations shall be vented either directly or by means of a building or local area exhaust to a control system which shall maintain compliance with any of the following requirements:
 - a. a minimum control efficiency of ninety eight per cent (98%) by weight for the VOC emissions;
 - b. a maximum outlet VOC concentration of twenty parts per million (20 ppm) by volume (dry basis); or,
 - c. a minimum incineration temperature of one thousand five hundred degrees Fahrenheit.
2. For a control system identified in paragraph (MM)(2) of OAC rule 3745-21-09 that employs incineration, the incineration temperature shall be determined by means of a continuous measurement and recording of such temperature.
3. Thermal Incinerator Operational Restriction

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports to the appropriate Ohio EPA District Office of local air agency that identify each month during which the 3-hour block average combustion temperature exceeded the limit in paragraph III (a) for this emissions unit.

These quarterly written reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January, April 30, July 31 and October 31 and shall cover the records the previous calendar quarter.

E. Testing Requirements

1. Emission testing shall be conducted within twelve (12) months after the issuance of this permit.

2. Emission Limitation

0.772 pound VOC per hour

a minimum control efficiency of ninety eight percent (98%) by weight; or,

a maximum of twenty parts per million (20 ppm) by volume on a dry basis; or,

a minimum combustion temperature of one thousand five hundred (1,500) degrees Fahrenheit.

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

the following test methods shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC and mass emission rates of toluene and methanol:

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are than 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the per cent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall

be conducted while this emissions unit is venting VOC emissions to the thermal incinerator.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests.

F. Air Toxic Emissions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

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Pollutant: Butyl acetate

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 713,000

Maximum Hourly Emission Rate (lbs/hr): 0.256

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.41

MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: Xylene

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.334

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.53

MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

REECO I Stack 7.167 feet diameter, 59.5 feet, above ground, 159,460 ACFM

2. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. Changes in the composition of the materials, or use of new materials, that would result in an increase

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in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

II. Emissions Unit P137

A. Applicable Emission Limitation and/or Control Requirements

The VOC emission limitations for emissions unit P137, dual 200 liter closed grinding mill and ancillary portable mixing tank is identified in the Air Emission Summary Section of this Permit to Install (PTI).

B. Operational Restrictions

1. The VOC emissions from this emissions unit included within the paint manufacturing operations shall be vented either directly or by means of a building or local area exhaust to a control system which shall maintain compliance with any of the following requirements:

- a. a minimum control efficiency of ninety eight percent (98%) by weight for the VOC emissions;
- b. a maximum outlet VOC concentration of twenty parts per million (20 ppm) by volume (dry basis); or,
- c. a minimum incineration temperature of one thousand five hundred degrees Fahrenheit.

2. For a control system identified in paragraph (MM)(2) of OAC rule 3745-21-09 that employs incineration, the incineration temperature shall be determined by means of a continuous measurement and recording of such temperature.

3. Thermal Incinerator Operational Restriction

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately

measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports to the appropriate Ohio EPA District Office of local air agency that identify each month during which the 3-hour block average combustion temperature exceeded the limit in paragraph III (a) for this emissions unit.

These quarterly written reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January, April 30, July 31 and October 31 and shall cover the records the previous calendar quarter.

E. Testing Requirements

1. Emission testing shall be conducted within twelve (12) months after the issuance of this permit.

2. Emission Limitation

1.543 pounds VOC per hour

a minimum control efficiency of ninety eight percent (98%) by weight; or,

a maximum of twenty parts per million (20 ppm) by volume on a dry basis; or,

a minimum combustion temperature of one thousand five hundred (1,500) degrees Fahrenheit.

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC and mass emission rates of toluene and methanol:

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are than 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the per cent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with

the test methods and procedures specified in OAC rule 3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while this emissions unit is venting VOC emissions to the thermal incinerator.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests.

F. Air Toxic Emissions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure

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compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Butyl acetate

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 713,000

Maximum Hourly Emission Rate (lbs/hr): 0.512

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.82

MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: Xylene

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.669

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1.07

MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

REECO I Stack 7.167 feet diameter, 59.5 feet, above ground, 159,460 ACFM

2. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Emissions Unit P138

A. Applicable Emission Limitation and/or Control Requirements

The VOC emission limitations for emissions unit P138, dual 90 liter closed grinding mill and ancillary portable mixing tank is identified in the Air Emission Summary Section of this Permit to Install (PTI).

B. Operational Restrictions

1. The VOC emissions from this emissions unit included within the paint manufacturing operations shall be vented either directly or by means of a building or local area exhaust to a control system which shall maintain compliance with any of the following requirements:

- a. a minimum control efficiency of ninety eight percent (98%) by weight for the VOC emissions;
- b. a maximum outlet VOC concentration of twenty parts per million (20 ppm) by volume (dry basis); or,
- c. a minimum incineration temperature of one thousand five hundred degrees Fahrenheit.

2. For a control system identified in paragraph (MM)(2) of OAC rule 3745-21-09 that employs incineration, the incineration temperature shall be determined by means of a continuous measurement and recording of such temperature.

3. Thermal Incinerator Operational Restriction

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately

measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports to the appropriate Ohio EPA District Office of local air agency that identify each month during which the 3-hour block average combustion temperature exceeded the limit in paragraph III (a) for this emissions unit.

These quarterly written reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January, April 30, July 31 and October 31 and shall cover the records the previous calendar quarter.

E. Testing Requirements

1. Emission testing shall be conducted within twelve (12) months after the issuance of this permit.

2. Emission Limitation

1.543 pounds VOC per hour

A minimum control efficiency of ninety eight per cent (98%) by weight; or

A maximum of twenty parts per million (20 ppm) by volume on a dry basis; or

A minimum combustion temperature of one thousand five hundred (1,500) degrees Fahrenheit.

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC and mass emission rates of toluene and methanol:

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are than 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the per cent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with

the test methods and procedures specified in OAC rule 3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while this emissions unit is venting VOC emissions to the thermal incinerator.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests.

F. Air Toxic Emissions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure

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compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Butyl acetate

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 713,000

Maximum Hourly Emission Rate (lbs/hr): 0.512

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.82

MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: Xylene

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.669

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 1.07

MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

REECO I Stack 7.167 feet diameter, 59.5 feet, above ground, 159,460 ACFM

2. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
 3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
 4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

IV. Emissions Unit P139

A. Applicable Emission Limitation and/or Control Requirements

The VOC emission limitations for emissions unit P139, single 60 liter closed grinding mill and ancillary portable mixing tank is identified in the Air Emission Summary Section of this Permit to Install (PTI).

B. Operational Restrictions

1. The VOC emissions from this emissions unit included within the paint manufacturing operations shall be vented either directly or by means of a building or local area exhaust to a control system which shall maintain compliance with any of the following requirements:

- a. a minimum control efficiency of ninety eight per cent (98%) by weight for the VOC emissions;
- b. a maximum outlet VOC concentration of twenty parts per million (20 ppm) by volume (dry basis); or,
- c. a minimum incineration temperature of one thousand five hundred degrees Fahrenheit.

2. For a control system identified in paragraph (MM)(2) of OAC rule 3745-21-09 that employs incineration, the incineration temperature shall be determined by means of a continuous measurement and recording of such temperature.

3. Thermal Incinerator Operational Restriction

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately

measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports to the appropriate Ohio EPA District Office of local air agency that identify each month during which the 3-hour block average combustion temperature exceeded the limit in paragraph III (a) for this emissions unit.

These quarterly written reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January, April 30, July 31 and October 31 and shall cover the records the previous calendar quarter.

E. Testing Requirements

1. Emission testing shall be conducted within twelve (12) months after the issuance of this permit.

2. Emission Limitation

1.235 pounds VOC per hour

A minimum control efficiency of ninety eight percent (98%) by weight; or

A maximum of twenty parts per million (20 ppm) by volume on a dry basis; or

A minimum combustion temperature of one thousand five hundred (1,500) degrees Fahrenheit.

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC and mass emission rates of toluene and methanol:

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are than 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the per cent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule

3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while this emissions unit is venting VOC emissions to the thermal incinerator.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests.

F. Air Toxic Emissions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s)

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specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Butyl acetate

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 713,000
Maximum Hourly Emission Rate (lbs/hr): 0.41
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.66
MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: Xylene

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 434,000
Maximum Hourly Emission Rate (lbs/hr): 0.535
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.86
MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

REECO I Stack 7.167 feet diameter, 59.5 feet, above ground, 159,460 ACFM

2. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission

limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

V. Emissions Unit P140

A. Applicable Emission Limitation and/or Control Requirements

The VOC emission limitations for emissions unit P140, single 60 liter closed grinding mill and ancillary portable mixing tank is identified in the Air Emission Summary Section of this Permit to Install (PTI).

B. Operational Restrictions

1. The VOC emissions from this emissions unit included within the paint manufacturing operations shall be vented either directly or by means of a building or local area exhaust to a control system which shall maintain compliance with any of the following requirements:

- a. a minimum control efficiency of ninety eight percent (98%) by weight for the VOC emissions;
- b. a maximum outlet VOC concentration of twenty parts per million (20 ppm) by volume (dry basis); or,
- c. a minimum incineration temperature of one thousand five hundred degrees Fahrenheit.

2. For a control system identified in paragraph (MM)(2) of OAC rule 3745-21-09 that employs incineration, the incineration temperature shall be determined by means of a continuous measurement and recording of such temperature.

3. Thermal Incinerator Operational Restriction

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately

measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports to the appropriate Ohio EPA District Office of local air agency that identify each month during which the 3-hour block average combustion temperature exceeded the limit in paragraph III (a) for this emissions unit.

These quarterly written reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January, April 30, July 31 and October 31 and shall cover the records the previous calendar quarter.

E. Testing Requirements

1. Emission testing shall be conducted within twelve (12) months after the issuance of this permit.

2. Emission Limitation

0.925 pound VOC per hour

A minimum control efficiency of ninety eight percent (98%) by weight; or

A maximum of twenty parts per million (20 ppm) by volume on a dry basis; or

A minimum combustion temperature of one thousand five hundred (1,500) degrees Fahrenheit.

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC and mass emission rates of toluene and methanol:

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are than 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the per cent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule

3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while this emissions unit is venting VOC emissions to the thermal incinerator.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests.

F. Air Toxic Emissions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s)

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specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Butyl acetate

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 713,000
Maximum Hourly Emission Rate (lbs/hr): 0.307
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.49
MAGLC ($\mu\text{g}/\text{m}^3$): 16,976

Pollutant: Xylene

TLV micrograms per cubic meter ($\mu\text{g}/\text{m}^3$): 434,000
Maximum Hourly Emission Rate (lbs/hr): 0.401
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.64
MAGLC ($\mu\text{g}/\text{m}^3$): 10,333

REECO I Stack 7.167 feet diameter, 59.5 feet, above ground, 159,460 ACFM

2. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission

limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.