Statement of Basis For Title V Permit

	Part I - General
Company Name	**PPG Industries - Barberton Plant - South Plant**
Premise Number	**16-77-02-0009**
What makes this facility a Title V facility?	**HCl**
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	**YES**
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	no
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	Added the requirements specified in 40 CFR Part 63, Subpart FFFF. Added authority citations. Moved PTI 16-1215 from the State only enforceable section to the State/federal enforceable section.

Part II (State and Federally Enforceable Requirements)		
Term and Condition (paragraph)	Basis	Comments

	SIP (3745-)	Other	
1		**Y**	**This facility is subject to the requirements of 40 CFR Part 68, Section 112(r).**
2 - 26		Y	The requirements of 40 CFR Part 63, Subpart FFFF
27		Y	Listing of Nonapplicable requirements
28		Y	Listing of insignificant emissions units.

C **<u>Instructions for Part II</u>:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

C If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)															
EU(s)	Limitation	Basis		ND	OR	M	St	Enf	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P098	8.0 lbs/hr OC, 40 lbs/day OC, unless reduced by 85%	21-07(G)(2)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time, 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. The pilot flame shall be maintained at all times in the flare's pilot light burner.
P098	90% destruction of OC	21-07(G)(6)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time, 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. The pilot flame shall be maintained at all times in the flare's pilot light burner.
P098	leak detection requirements	21-09(DD)(16)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Permittee shall employ alarm sensors in the stack to activate an ammonia deluge system if either stack monitor indicates a "high" phosgene value. The destruction efficiency of the deluge system shall be at least 95%. The rupture disk shall be capable of capturing and transporting any leakage through the pressure relief device to the stack. Unless the leak is immediately repaired, the permittee shall not employ the phosgene process unit untill the leaking equipment is repaired and all leak tests are negative. ET: Emissions testing would not demonstrate compliance with the leak detection requirements.
P099	8.0 lbs/hr OC, 40.0 lbs/day OC, unless reduced by 85%	21-07(G)(2)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: The permittee shall maintain a vacuum less than or equal to 6" of water across the scrubber, and the scrubber water flow rate shall be not less than 3.0 gallons per minute.
P098	2.0 lbs/hr OC		31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time, 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. The pilot flame shall be maintained at all times in the flare's pilot light burner.

P098	1.7 lbs/hr HCl		31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time, 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. The pilot flame shall be maintained at all times in the flare's pilot light burner.
P098	0.3 lbs/hr CL2		31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time, 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. The pilot flame shall be maintained at all times in the flare's pilot light burner.
P098	1.2 lbs/hr CO		31-05	N	N	N	N	N	N	N	N	N	N	N	ET: Testing has been done in the past and results are minimal emissions, emissions are basically product of combustion from control device.
P098	1.6 lbs/hr NOx		31-05	N	N	N	N	N	N	N	N	N	N	N	ET: Testing has been done in the past and results are minimal emissions, emissions are basically product of combustion from control device.

EU = emissions unit id
OR = operational restriction
M = monitoring requirements
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

    To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M", "R", "Rp" and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no comments. Also, if a "Y" is noted under "OR" or "Misc," an explanation of the requirements should be provided in the "Comments" section. In addition to a general explanation of the "OR" and/or "Misc," the following should be provided:

    1. For an operational restriction, clarify if appropriate monitoring, record keeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
    2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the

"Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.

3. If superseding language is included in the "Miscellaneous Requirements" section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an "N" is noted in the "OR" column or in the "Misc" column.

C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.