

# Statement of Basis For Title V Permit

Company Name	<b>PPG Industries - Barberton Plant</b>	
Premise Number	<b>16-77-02-0009</b>	
Number of Non-insignificant Emissions Units	<b>2</b>	
What makes this facility a Title V facility?	<b>Trichloroethylene</b>	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	<b>YES</b>	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
<b>1</b>		<b>Y</b>	<b>This facility is subject to the requirements of the CAM rule.</b>

- **Instructions for Part II:**

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.

- 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		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
P108 & P110	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	<p>OR - Permittee shall maintain a pressure drop across the baghouse withing the range of 0.5 to 6.0 inches of water. The permittee shall record the actual pressure drop on a daily basis and shall submit deviation reports on a quarterly basis.</p> <p>ET - Permittee shall demonstrate compliance through monitoring and record keeping requirements. Emission testing is not required due to the fact that this is mainly a source of organics.</p>
P108 & P110	<p>3.53 lbs/hr &amp; 15.5 TPY PM at stack P108-S01</p> <p>2.49 lbs/hr &amp; 10.9 TPY PM</p>	17-11		Y	Y	Y	Y	N	N	<p>OR - Permittee shall maintain a pressure drop across the baghouse withing the range of 0.5 to 6.0 inches of water. The permittee shall record the actual pressure drop on a daily basis and shall submit deviation reports on a quarterly basis.</p> <p>ET - Permittee shall demonstrate compliance through monitoring and record keeping requirements. Emission testing is not required due to the fact that this is mainly a source of organics.</p>
P108 & P110	8 lbs/hr and 40 lbs/day OC, unless reduces by 85% (combined stack and fugitive emissions)	21-07(G)(2)		Y	Y	Y	Y	Y	N	<p>OR - CAM is applicable and a CAM plan has been submitted. Permittee shall maintain the total mass steam flow rate from the carbon adsorber, for any carbon bed regeneration cycle, shall not be more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee shall operate and maintain a continuous monitor and recorder which measures and records the steam flow rate from the carbon adsorber. The permittee shall submit deviation reports on a quarterly basis.</p>

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.

- 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.