

Statement of Basis For Title V Permit

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| Company Name | PPG Industries Ohio, Inc. | |
| Premise Number | 13 18 00 0101 | |
| What makes this facility a Title V facility? | VOC | |
| 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 | |

| Part II (State and Federally Enforceable Requirements) | | | |
|---|-----------------|-------|---|
| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
| A.I.1 | 31-02(A)(2) | | Facility wide emissions shall not exceed 163.4 TPY VOC, 14.4 TPY PE, 35.8 TPY SO ₂ , 64.0 TPY NO _x and 47.8 TPY CO as a rolling, 12-month summation. Facility wide fuel volume usage shall not exceed 1,079,230,000 cubic feet of natural gas and 1,000,000 gallons of distillate oil as a rolling 12-month summation. |
| A.I.2.a | 31-02(A)(2) | | This is to restrict emission rates and fuel usage to below the “significant” emission levels. |
| A.II. | | | No terms and conditions |
| A.III. | 31-02(A)(2) | | Maintain monthly records of the facility wide VOC, PE, SO ₂ , NO _x and CO emission rates as a rolling, 12-month summation. Maintain monthly records of the rolling, 12-month natural gas volume usage & distillate oil volume usage. |
| A.IV. | 31-02(A)(2) | | Quarterly deviation reports on facility-wide emission rates as a rolling, 12-month summation, and natural gas volume usage and distillate oil volume usage as a rolling, 12-month summation. |
| A.V. | 31-05 | | Using USEPA AP-42 emission factors, USEPA TANKS 4 program, USEPA SPECIATE version 3.1, FIRE version 6.22, USEPA’s Control of Volatile Organic Compounds Emissions from Ink and Paint Manufacturing Processes, USEPA’s 1995 Protocol for Equipment Leak Emission Estimates, stack test emission data, material balance calculations, or other agency-approved emission factors to calculate emission rates to demonstrate compliance with the terms and conditions of this permit. |

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| A.VI. | 31-05 | <p>Lists of permits to install issued to PPG Industries Ohio, Inc., Cleveland, Ohio and five tables of emissions units. The five tables consist of non-insignificant emissions units, paint laboratory operations emissions units, paint manufacturing operations emissions units, dedicated water based paint manufacturing production equipment and insignificant emissions units.</p> <p>This permit is designed to contain all emissions units that are required to obtain a permit to operate and a list of insignificant emissions units.</p> <p>Terms and conditions for PPG Industries Ohio, Inc. to apply for a permit to install.</p> <p>Annual update to the emissions unit tables 2, 3, and 4 or a report of no revisions are required. The report is due by February 28 of each year.</p> <p>Annual update to Table 5 (Insignificant Emissions Units) which is due by February 28 of each year.</p> <p>This permit incorporates all applicable requirements, including emission limitation/control measures, established pursuant to Best Available Technology rule and specified terms and conditions in the permits to install listed in Table A.</p> |
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C 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.

| Part III (Requirements Within the State & Federally Enforceable Section) | | | | | | | | | | | | | | | |
|--|--|--------------|-------|----|----|---|----|-----|---|----|----|----|----|------|--|
| Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III. | | | | | | | | | | | | | | | |
| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| B007 | 0.5% sulfur by weight; 0.526 lb SO ₂ /mmBtu when burning distillate oil | 31-05(A)(3) | | N | N | Y | N | N | Y | N | Y | N | N | N | ET - compliance demonstrated using emission factors and the M, R, and Rp. |
| B007 | 20% opacity 6-minute ave | 17-07(A)(1) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - burn only natural gas or fuel oil - M, R, Rp included. ET - use of inherently clean fuels - if required, demonstrate compliance using 40 CFR 60, Appendix A, Method 9. |

| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
|-------|--|--------------|-------|----|----|---|----|-----|---|----|----|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| B007 | 0.02 lb PE/mmBtu | 17-10 (B)(1) | | N | N | N | N | N | N | N | N | N | N | N | M, R, Rp, and ET - compliance demonstrated with emission factors - if required, demonstrate compliance using 40 CFR 60, Appendix A, Methods 1-5. |
| B007 | No emission limit | 18-06(A) | | Y | N | N | N | N | N | N | N | N | N | N | ND - Exempt pursuant to OAC rule 3745-18-06(B). |
| B007 | No emission limit | 21-08(B) | | Y | N | N | N | N | N | N | N | N | N | N | ND - "best available control techniques and operating practices" |
| B007 | No emission limit | 23-06(B) | | Y | N | N | N | N | N | N | N | N | N | N | ND - "latest available control techniques and operating practices" |
| B007 | 0.053 lb PE/hour; 0.017 lb SO2/hour; 0.154 lb VOC/hour; 2.80 lbs NOx/hour; 2.35 lbs CO/hour when burning natural gas | 31-05(A)(3) | | N | N | N | N | N | N | N | N | N | N | N | M, R & Rp - none - natural gas is a presumed "inherently clean fuel." ET - for natural gas, calculate emission rates in lbs/hour with emission factors and maximum hourly natural gas usage rate, and if required test with appropriate methods found in 40 CFR 60 Appendix A. |
| B007 | 0.233 ton PE/year; 0.074 ton SO2/year; 0.675 ton VOC/year; 12.26 tons NOx/year 10.30 tons CO/year when burning natural gas | 31-05(A)(3) | | N | N | N | N | N | N | N | N | N | N | N | M, R & Rp - none - natural gas is a presumed "inherently clean fuel." ET - for natural gas, calculate emission rates in tons/year with maximum hourly emission limitations, 8760 hours per year and a conversion factor. |

| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
|-------|---|-------------|-------|----|----|---|----|-----|---|----|----|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| B007 | 0.42 lb PE/hour; 14.73 lbs SO2/hour; 0.07 lb VOC/hour; 5.26 lbs NOx/hour; 1.04 lbs CO/hour when burning distillate oil | 31-05(A)(3) | | N | N | Y | N | N | Y | N | N | N | N | N | M & R - for distillate oil, tracking sulfur content. Rp - none - distillate oil is a presumed "inherently clean fuel." ET - for distillate oil, calculate emission rates in lbs/hour with emission factors and maximum hourly oil usage rate and if required test with appropriate methods in 40 CFR 60 Appendix A. |
| B007 | 1.0 ton PE/year; 0.2 ton VOC/year; 10.0 tons NOx/year; 2.5 tons CO/year; 35.5 tons SO2/year when burning distillate oil | 31-05(A)(3) | | N | N | Y | N | N | Y | N | Y | N | N | N | ET - for distillate oil, calculate emission rates in tons/year with maximum hourly emission limitations, 8760 hours/year and a conversion factor. |
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| K201 | 90% VOC control or 20 ppmv dry VOC | 31-05(A)(3) | | N | Y | Y | N | N | Y | N | Y | N | Y | N | OR - combustion temperature - M, R, Rp included. |
| K201 | 45.0 tons VOC/year | 31-05(A)(3) | | N | N | Y | N | N | Y | N | Y | N | N | N | ET - emission calculations based upon emission factors established by emission testing conducted earlier. |

| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
|-------|---|--------------|-------|----|----|---|----|-----|---|----|----|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| K201 | 0.3 lb PE/hr; 1.2 tons PE/year | 31-05(A)(3) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - operate particulate control system - M, R, Rp included. ET - hourly emission rate calculations are based on solid content of maximum coating usage, coating transfer efficiency. Annual emission rate calculations are based on maximum hourly emission rate, 8760 hours/year and a conversion factor. |
| K201 | 5% opacity 6-minute average | 31-05(A)(3) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - operate a particulate control system and perform weekly VE checks - M, R, Rp included. ET - perform weekly VE checks. |
| K201 | 0.07 lb VOC/hr; 0.02 lb PE/hr; 0.01 lb SO2/hr; 1.30 lbs NOx/hr; 1.09 lbs CO/hr when burning natural gas | 31-05(A)(3) | | N | N | N | N | N | N | N | N | N | N | N | M, R, Rp & ET - these lbs/hr emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation. |
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| P201 | operate PE control device(s) | 31-05 | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - operate PE control device(s) when this emissions unit was in operation and pigment is being blended - M, R & Rp - included. - CAM rule is not currently applicable. ET - not needed for this requirement. |
| P201 | 100.0 tons of VOC/year | 31-05(A)(3) | | N | N | Y | N | N | Y | N | Y | N | N | N | ET - emission calculations based upon emission factors established by emission testing conducted earlier. |

| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
|-------|--|--------------|-------|----|----|---|----|-----|---|----|----|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| P201 | 1.4 lbs PE/hr; 6.0 tons PE/year | 31-05 (A)(3) | | N | N | N | N | N | N | N | N | N | N | N | M, R, Rp & ET - these emission limitations are based on the emissions unit's potential to emit, with controls. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. |
| P201 | 5% opacity 6-minute average from REECO I | 31-05 (A)(3) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - burn only natural gas in the incinerator - M, R, Rp included. - CAM rule is not currently applicable. ET - perform weekly VE checks. |
| P201 | 5% opacity 6-minute average from dust collector | 31-05 (A)(3) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - operate particulate control device - M, R, Rp included. - CAM rule is not currently applicable. ET - perform weekly VE checks. |
| P201 | 5% fugitive opacity 3-minute average | 31-05 (A)(3) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - blending tanks equipped with a cover or lid - M, R, Rp included for VE checks. - CAM rule is not currently applicable. ET - perform weekly VE checks. |
| P201 | 0.07 lb VOC/hr; 0.02 lb PE/hr; 0.01 lb SO2/hr; 1.30 lbs NOx/hr; 1.09 lbs CO/hr | 31-05 (A)(3) | | N | N | N | N | N | N | N | N | N | N | N | M, R, Rp & ET - these lbs/hr emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with this emission limitation. |

| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
|-------|---|-----------------------------|-------|----|----|---|----|-----|---|----|----|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| P201 | operate dust collectors with sufficient air volume | 31-05 (A)(3) | | N | N | N | N | N | N | N | N | N | N | N | M, R, Rp & ET - daily monitoring of use of PE control device(s), weekly observations of visible emissions from REECO I, weekly observations of visible emissions from PE control device(s) and weekly observations of visible fugitive emissions from PE control device(s) provide indication of ongoing compliance ensuring that the PE control device(s) are operated with sufficient air volume. Weekly observation was chosen as reasonable. |
| P201 | 98% VOC control, 20 ppmv dry VOC or 1500 degrees Fahrenheit | 31-05 (A)(3) | | N | Y | Y | N | N | Y | N | Y | N | Y | N | OR - combustion temperature - M, R, Rp included. |
| P201 | water based paint manufacturing | 21-09(MM)(2) | | Y | N | N | N | N | N | N | N | N | N | N | ND - exempt provided the processing or use of a waterbased paint material satisfies three conditions: dedicated solely to waterbased paint materials, VOC content by weight less than 12.0% and any VOC emission not vented to control systems are included in a permit to install issued by the Director of Ohio EPA after August 22, 1990. |
| | | | | | | | | | | | | | | | |
| P202 | 5.0 tons VOC/year | 31-05(A)(3) | | N | N | Y | N | N | Y | N | Y | N | N | N | ET - emission calculations based on USEPA's TANKS program and record keeping information. |
| P202 | water based paint manufacturing | 21-09(MM)(2) & 21-09(MM)(3) | | Y | N | N | N | N | N | N | N | N | N | N | ND - exempt provided the processing or use of a waterbased paint material satisfies three conditions: (1) dedicated solely to waterbased paint materials, (2) VOC content by weight less than 12.0% and (3) any VOC emissions not vented to control systems are included in a permit to install issued by the Director of Ohio EPA after August 22, 1990. |
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EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

C **Instructions for Part III:**

- C 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.
- C If the SIP (not including OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- 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 requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.