

Statement of Basis For Title V Permit

	Part I - General	
Company Name	PPG Industries - Barberton Plant - North Plant	
Premise Number	16-77-02-0009	
What makes this facility a Title V facility?	HCl & methylene chloride	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 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)	PTI 16-1102 for P080 moved from the State enforceable side to the State/federal enforceable side. Added 40 CFR Part 63, Subpart FFFF requirements. Added authority citations.	

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
1		X	Listings of insignificant emissions units
2 - 26		X	40 CFR Part 63, Subpart FFFF

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)

EU(s)	Limitation	Basis		N D	OR	M	S t	R	St	Rp	S t	E T	Misc	Comments
		SIP (3745-)	Other											
P080	20% opacity as a 6-minute average	17-07		N	N	Y	N	Y	N	Y	N	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P080	4.10 lbs/hr PM	17-11		N	N	Y	N	Y	N	Y	N	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P080	85% reduction of OCs	21-07(G)(2)		N	Y	Y	N	Y	N	Y	N	Y	N	OR - CAM rule is not currently applicable. The operational restrictions, monitoring, record keeping, reporting, and emission testing requirements shall demonstrate compliance with the rule. The permittee shall maintain a pilot flame in the flare's pilot light burner whenever this unit is in operation and employing organic compounds. This will ensure that the limitation is complied with.
P080	90% destruction of OCs	21-07(G)(6)		N	Y	Y	N	Y	N	Y	N	Y	N	OR - CAM rule is not currently applicable. The operational restrictions, monitoring, record keeping, reporting, and emission testing requirements shall demonstrate compliance with the rule. The permittee shall maintain a pilot flame in the flare's pilot light burner whenever this unit is in operation and employing organic compounds. This will ensure that the limitation is complied with.
P105	20% opacity as a 6-minute average	17-07		N	Y	Y	N	Y	N	Y	N	N	N	OR - CAM rule is not currently applicable. The operational restrictions, monitoring, record keeping, and reporting requirements shall demonstrate compliance with the rule. The permittee shall operate the baghouse in accordance with the manufacturer's specified instructions, which in this case, is to maintain the pressure drop within 1.0 to 3.0 inches of water. This will ensure that the emission limitation is complied with. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P105	4.10 lbs/hr PM	17-11		N	Y	Y	N	Y	N	Y	N	N	N	OR - CAM rule is not currently applicable. The operational restrictions, monitoring, record keeping, and reporting requirements shall demonstrate compliance with the rule. The permittee shall operate the baghouse in accordance with the manufacturer's specified instructions, which in this case, is to maintain the pressure drop within 1.0 to 3.0 inches of water. This will ensure that the emission limitation is complied with. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.

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

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 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.
- C **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.