

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
Company Name	PPG Industries - Barberton Plant (Teslin)
Premise Number	16-77-02-0009
What makes this facility a Title V facility?	Trichloroethylene
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.	Both Teslin lines vent to the same carbon adsorption unit. Testing is done with both lines in operation.
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 16-01776 modification of P110 to quantify fugitive emissions PTI 1601955 new production line P114 Added citations of authority. Moved PTI requirements to the State/federal side of the permit. Updated insignificant emissions unit language. Added CAM requirements from 40 CFR Part 64.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1		x	Provides a summary of the insignificant emissions units along with any associated PTIs.

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 and 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												
P110 P114	5% opacity as a 6-minute average		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	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.  ET - Permittee shall demonstrate compliance through monitoring and record keeping requirements. Method 9 testing is not currently being required.

P110	0.8 lb/hr of organic compounds (OC) and 3.5 tpy of OC (vent emissions from P110 - S01 stack)		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 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.
P110	90% reduction of organic compounds (OC) (combined stack and fugitive emissions)		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 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.
P110	fugitive OC emissions are limited to 191 lbs/day and 33.8 tpy		3745-31-05	N	N	Y	N	N	Y	N	Y	N	N	N	ET - No appropriate USEPA test method available. Permittee using mass balance emission calculations to track compliance.
P110	2.49 lbs/hr of particulate emissions 10.9 tpy of particulate emissions		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	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.  ET - Permittee has done testing previously and results were quite low.

P114	0.03 gr/scf of exhaust gasses from baghouse controlling dry material handling (stack P108-S01 )		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	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.  ET - Permittee has done testing previously and results were quite low.
P114	0.5 lb/hr particulates (combined emissions from stacks P108-S01 and P114-S02 ) 2.2 tpy particulates		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	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.  ET - Permittee has done testing previously and results were quite low.
P114	9.0 lbs/hr Trichloroethylene/Organic Compounds (TCE/OC) (combined stack and fugitive emissions ) 39.4 tpy TCE/OC (combined stack and fugitive emissions )		3745-31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	

P114	90% reduction of TCE, as a 30-day rolling average calculated on a daily basis (combined stack and fugitive emissions )		3745-31-28 and 40 CFR Part 63	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 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.
P114	99% control efficiency of carbon adsorption unit, or 5 ppm outlet gas concentration		3745-31-28 and 40 CFR Part 63	N			N	N		N		N		N	OR - 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.

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.
2. 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.

- **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.