

**ALLEGHENY COUNTY HEALTH
DEPARTMENT AIR QUALITY PROGRAM**

<u>In the Matter of:</u>	:	Appeal of
PPG Industries, Inc.	:	Title V Operating Permit No. 0057-
PPG Industries – Springdale Plant	:	OP18a, Minor Modification to
125 Colfax Street	:	Installation Permit No. 0057-I005C, and
Springdale, PA 15144-1506	:	Installation Permit No. 0057-I011
	:	

MOTION TO DISMISS

AND NOW COMES the Allegheny County Health Department (hereinafter “ACHD”), by and through its undersigned counsel, and hereby moves this tribunal, through this Motion to Dismiss PPG Industries, Inc., Springdale Plant’s (hereinafter “Appellant” or “PPG Springdale” or “Paint Plant”), Appeal of ACHD’s May 2018 Title V Operating Permit No. 0057-OP18a, February 2020 Minor Modification to Installation Permit No. 0057-I005C, and January 2022 Installation Permit No. 0057-I011, to dismiss all of Appellant’s appeals with prejudice. In support of its motion, ACHD submits the following:

1. Appellant operates a paint manufacturing plant and research and development facility in Springdale, Pennsylvania, which is located in Allegheny County. This facility is also known as PPG Springdale.

2. On May 10, 2018, ACHD issued Title V Operating Permit NO. 0057-OP18a to PPG Springdale.

3. On February 28, 2020, ACHD issued a minor modification to Installation Permit 0057-I005C, also referred to as an amendment to the permit.

4. ACHD issued the 2020 amendment for the Pennsylvania State Implementation Plan (SIP).

5. The federal Clean Air Act (CAA) is administered by the Environmental Protection

Agency (EPA) through each state's SIP.

6. SIPs contain rules, conditions, agreements and permits that the state will use to ensure compliance with the CAA.

7. One element of Pennsylvania's SIP is a requirement called Reasonably Available Control Technology, or RACT.

8. The EPA defines RACT as "the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility." 44 F.R. 53762.

9. The pollution control technology for the destruction of volatile organic compounds (VOCs) emitted from PPG Springdale are two regenerative thermal oxidizers (RTOs).

10. The 2018 permit and 2020 amendment require PPG Springdale to operate its RTOs with a minimum VOC destruction efficiency of 98% by weight. *See* Title V Permit Condition V.A.1.d.1, and Installation Permit Condition V.A.1.b.1, attached hereto as Exhibits 1 and 2.

11. PPG Springdale compliance testing showed that the Paint Plant's RTO was able to achieve a 98% destruction efficiency, which demonstrates that the RTO operating at 98% is RACT.

12. On April 6, 2020, PPG Springdale appealed both the May 2018 Operating Permit No. 0057-OP18a, and the February 2020 Minor Modification to Installation Permit 0057-I005c, specifically objecting to the RTO 98% destruction efficiency conditions.

13. That appeal remained pending amidst the COVID-19 pandemic, and throughout various discussions with PPG Springdale regarding the destruction efficiency.

14. On January 27, 2022, ACHD issued a Title V installation permit (herein after "the January 2022 permit") to Appellant, specifically addressing the replacement of PPG Springdale's

Dispersion Process Basket Mill with a 20-liter Hochmeyer Mill, and the installation of two new high-speed mixers in the plant's small order department. *See* Exhibit 3, attached hereto.

15. The emissions control device for both the Hochmeyer Mill and the two high-speed mixers is PPG Springdale's existing Paint Plant regenerative thermal oxidizer (RTO).

16. The January 2022 permit requires that:

The permittee shall reduce emissions of total organic HAP (hazardous air pollutants) from stationary process vessels by 98 percent (by weight) or greater by venting emissions through the existing Paint Plant regenerative thermal oxidizer (RTO) at all times when paint is being produced.

Installation Permit No. 0057-I011, p. 17, Condition V.A.1.e.

17. On February 28, 2022, Appellant filed its appeal challenging the January 2022 permit conditions requiring 98% destruction efficiency for its Paint Plant RTO and requesting 95% destruction efficiency.

18. Pursuant to Article XXI, §2102.04.b.6, installation permits require that "for new sources, BACT has been applied."

19. BACT is an acronym that stands for "best available control technology," and is a different determination than RACT.

20. The replacement of PPG Springdale's Dispersion Process Basket Mill with a 20-liter Hochmeyer Mill, and the installation of two new high-speed mixers, constitutes a new source requiring BACT.

21. PPG Springdale compliance testing showed that the Paint Plant's RTO was able to achieve a 98% destruction efficiency, which demonstrates that the RTO operating at 98% is the BACT for emissions from the new Hochmeyer Mill and the two new high-speed mixers.

22. On October 21, 2022, the EPA approved case-by-case RACT determinations for certain VOC sources at PPG Springdale, as required to meet obligations pursuant to the 2008 8-

hour ozone National Ambient Air Quality Standards (NAAQS), as revisions to the Pennsylvania SIP. *See* Approval and Promulgation of Air Quality Implementation Plans; Pennsylvania; Reasonably Available Control Technology Determinations for PPG Industries Springdale Plant’s Case-by-Case Sources under the 2008 8-Hour Ozone National Ambient Air Quality Standards, 87 Fed. Reg. 182, 57609 (Sept. 21, 2022) (to be codified at 40 C.F.R. part 52).

23. This case-by-case RACT determination for VOCs at PPG Springdale, including the permit condition to operate its RTO at 98% destruction efficiency, was a final action by the EPA.

24. Pursuant to 42 U.S.C. § 7607(b), PPG Springdale had 60 days to appeal this final action, which expired December 20, 2022.

25. PPG Springdale did not appeal the EPA’s final action, and, therefore that action has become final and binding in this matter. *Potratz v. Com., Dep’t of Env’t Prot.*, 897 A.2d 16, 19 (Pa. Commw. Ct. 2006) (citing *Dep’t of Env’t Prot. v. Peters Township Sanitary Authority*, 767 A.2d 601 (Pa. Commw. Ct. 2001)); *City of Philadelphia v. Sam Bobman Dep’t Store Co.*, 149 A.2d 518, 521 (Pa. Super. Ct. 1959) (citing *Curran v. Delano*, 84 A. 452 (Pa. 1912); *Commonwealth to Use of Unemployment Compensation Fund v. Lentz*, 44 A.2d 291 (PA. 1945)). Appellant may not now seek relief.

26. Pursuant to ACHD Rules and Regulations Article XI, Hearings and Appeals, §1104.B, Appellant must “set forth with particularity the manner in which the Appellant is aggrieved by the action of the Department . . . and the grounds for his or her appeal.”

27. Appellant has failed to sufficiently show that permit conditions requiring PPG Springdale to operate their RTO at 98% destruction efficiency is not BACT, RACT, or is otherwise “inappropriate, unlawful or unreasonable” when BACT is required by Article XXI, §2102.04.b.6; and the 98% destruction efficiency is a RACT condition of Pennsylvania’s SIP.

CONCLUSION

For the foregoing reasons, ACHD respectfully requests that this tribunal dismiss with prejudice all of Appellant PPG Springdale, Inc.'s Appeals addressed herein, namely the May 10, 2018 Title V Operating Permit NO. 0057-OP18a, the February 28, 2020 minor modification to Installation Permit 0057-I005C, and the January 27, 2022, Installation Permit No. 0057-I011.

Respectfully submitted,

/s/ Sherry Golebiewski

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EXHIBIT 1



AIR QUALITY PROGRAM
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1811

Title V Operating Permit
& Federally Enforceable State Operating Permit

Issued To: PPG Industries, Inc.

ACHD Permit #: 0057-OP18a

Facility: PPG Industries – Springdale Plant
125 Colfax Street
Springdale, PA 15144-1506


Date of Issuance: May 10, 2018

Amendment Date: February 28, 2020

Expiration Date: May 9, 2023

Renewal Date: December 9, 2022

Issued By:


JoAnn Truchan, P.E.
Section Chief, Engineering

Prepared By:

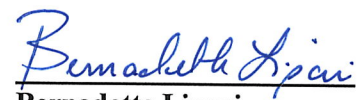

Bernadette Lipari
Air Quality Engineer

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AMENDMENTS:

<i>DATE</i>	<i>SECTION(S)</i>
02/28/20	Section V.A – revised Paint Plant thermal oxidizer efficiency; Sections V.A-F – Added citations for Ozone RACT II requirements.

II. FACILITY DESCRIPTION

PPG Industries, Inc. – Springdale Plant is a paint manufacturing plant and research & development facility. The paint plant produces coatings for aluminum extrusions, general industrial, and coil coating. Within the main paint manufacturing buildings is housed a series of technical laboratories providing testing and customer support for PPG Coatings. The paint manufacturing building also houses manufacturing support laboratories, which oversee the quality and other parameters of products, manufactured. The research and development plant provides scale-up support for resin manufacture and tests new resins used in coatings.

The facility is a major source of volatile organic compounds (VOC's) and hazardous air pollutants (HAP's), and a minor source of particulate matter (PM), particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), nitrogen oxides (NO_x), sulfur oxides (SO_x), and carbon monoxide (CO) as defined in Article XXI, §2101.20. The facility is also a minor source of greenhouse gas emissions (CO_{2e}) as defined in the U.S. EPA Greenhouse Gas Tailoring Rule.

The emission units regulated by this permit are summarized in Table II-1:

TABLE II-1: Emission Unit Identification

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
Paint Plant					
P001 P002	CP Cell Work Center				
	Coaxial/Mill – PM-205	Paint Plant RTO / Ohio Blowpipe	2,000 gallons	pigment, resin, solvent	S001 S002
	Coaxial/Mill – PM-206	Paint Plant RTO / Ohio Blowpipe	2,000 gallons	pigment, resin, solvent	S001 S002
	3 Mills – PM-1, 2, & 5		45 liters ea. & portable tanks	pigment, resin, solvent	
	Mill – PM-8		45 liters ea.	pigment, resin, solvent	
	Tanks 1102-1104	Paint Plant RTO / Ohio Blowpipe	1,100 gallons ea.	pigment, resin, solvent	S001 S002
	Tanks 2003-2004	Paint Plant RTO	2,000 gallons ea.	pigment, resin, solvent	S001
	Tanks 2301-2304	Paint Plant RTO	2,300 gallons ea.	pigment, resin, solvent	S001
	Tank 4001	Paint Plant RTO	4,000 gallons	pigment, resin, solvent	S001
	CP Tank 109	Paint Plant RTO / Ohio Blowpipe	17,200 gallons	pigment, resin, solvent	S001 S002
	10 hp Cowles	Paint Plant RTO / PVC Line Baghouse	n/a (portable tanks)	pigment, resin, solvent	S001 S005
P001 P002	Light Cell Work Center				
	Coaxial/Mill – PM-207	Paint Plant RTO / Ohio Blowpipe	2,000 gallons	pigment, resin, solvent	S001 S002
	Tanks 2008-2013	Paint Plant RTO	2,000 gallons ea.	pigment, resin, solvent	S001
	Tanks 4002-4004	Paint Plant RTO	4,000 gallons ea.	pigment, resin, solvent	S001

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	Tanks 4006-4007	Paint Plant RTO / Ohio Blowpipe	4,000 gallons ea.	pigment, resin, solvent	S001 S002
	Tanks 4009-4010	Paint Plant RTO / Ohio Blowpipe	4,000 gallons ea.	pigment, resin, solvent	S001 S002
	Coaxial – T-900	Paint Plant RTO / Ohio Blowpipe	900 gallons	pigment, resin, solvent	S001 S002
	Coaxial – T-1650	Paint Plant RTO / Ohio Blowpipe	1,650 gallons	pigment, resin, solvent	S001 S002
P001 P002	Dark Cell Work Center				
	Coaxial - 208	Paint Plant RTO / Ohio Blowpipe	2,000 gallons	pigment, resin, solvent	S001 S002
	Coaxial/Mill – PM-213	Paint Plant RTO / PVC Line Baghouse	2,000 gallons	pigment, resin, solvent	S001 S005
	Mill – PM-208		200 liter & portable tanks	pigment, resin, solvent	
	3 Mills – PM-4, 7, & 9	Paint Plant RTO / Ohio Blowpipe	45 liters ea. & portable tanks	pigment, resin, solvent	S001 S002
	Mill – PM-214	Paint Plant RTO / Ohio Blowpipe	200 liter & portable tanks	pigment, resin, solvent	S001 S002
	Tank 1101	Paint Plant RTO / Stationary Tank Dust Collector	1,100 gallons	pigment, resin, solvent	S001
	Tanks 1501-1507	Paint Plant RTO / Stationary Tank Dust Collector	1,500 gallons ea.	pigment, resin, solvent	S001
	Tanks 2001-2002	Paint Plant RTO / Stationary Tank Dust Collector	2,000 gallons ea.	pigment, resin, solvent	S001
	Tanks 2005-2007	Paint Plant RTO / Stationary Tank Dust Collector	2,000 gallons ea.	pigment, resin, solvent	S001
	Tank 4005	Paint Plant RTO / Stationary Tank Dust Collector	4,000 gallons	pigment, resin, solvent	S001
	Tank 4008	Paint Plant RTO / Stationary Tank Dust Collector	4,000 gallons	pigment, resin, solvent	S001
	Tanks 4011-4012	Paint Plant RTO / Stationary Tank Dust Collector	4,000 gallons ea.	pigment, resin, solvent	S001
	75 hp Cowles	Ohio Blowpipe	n/a (portable tanks)	pigment, resin, solvent	S002
	60 hp Cowles	Ohio Blowpipe	n/a (portable tanks)	pigment, resin, solvent	S002
	50 hp Cowles	Ohio Blowpipe	n/a (portable tanks)	pigment, resin, solvent	S002
	Automatic Tank Cleaner	Paint Plant RTO	Booth 3 & 4	solvent	S001

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
P001 P002	Large Batch Center				
	Mill – PM-6		45 liters	pigment, resin, solvent	
	Mill – PM-201		200 liters	pigment, resin, solvent	
	Mill – PM-203		200 liters	pigment, resin, solvent	
	Mill – PM-204		200 liters	pigment, resin, solvent	
	Tanks 102-104	Paint Plant RTO / Ohio Blowpipe	1,100 gallons ea.	pigment, resin, solvent	S001 S002
	Tank 105	Paint Plant RTO / Ohio Blowpipe	2,200 gallons	pigment, resin, solvent	S001 S002
	Tanks 106-107	Paint Plant RTO / Ohio Blowpipe	4,200 gallons ea.	pigment, resin, solvent	S001 S002
	Tanks 108-111	Paint Plant RTO / Ohio Blowpipe	4,500 gallons ea.	pigment, resin, solvent	S001 S002
	Tank 112	Paint Plant RTO / Ohio Blowpipe	3,600 gallons	pigment, resin, solvent	S001 S002
	Tank 113	Paint Plant RTO / Ohio Blowpipe	4,000 gallons	pigment, resin, solvent	
	Tanks 200-2024	Paint Plant RTO / Ohio Blowpipe	100 gallons ea.	pigment, resin, solvent	S001 S002
	Tank 203	Paint Plant RTO / Ohio Blowpipe	2,000 gallons	pigment, resin, solvent	S001 S002
	Tank 204	Paint Plant RTO / Ohio Blowpipe	2,500 gallons	pigment, resin, solvent	S001 S002
P001 P002	Environ Work Center				
	Coaxial/Mill – PM-210	Paint Plant RTO / Environ Baghouse	2,500 gallons	pigment, resin, solvent	S001 S003
	Coaxial/Mill – PM-211	Paint Plant RTO / Environ Baghouse	2,500 gallons	pigment, resin, solvent	S001 S003
	Coaxial/Mill – ET-1500	Paint Plant RTO / Environ Baghouse	2,100 gallons	pigment, resin, solvent	S001 S003
	Coaxial/Mill – ET-2000	Paint Plant RTO / Environ Baghouse	2,100 gallons	pigment, resin, solvent	S001 S003
	Mixers #1-3	Paint Plant RTO / Environ Baghouse	1,600 gallons ea.	pigment, resin, solvent	S001 S003
	Mixer #4	Paint Plant RTO / Environ Baghouse	2,000 gallons	pigment, resin, solvent	S001 S003
	Mixer #5	Paint Plant RTO / Environ Baghouse	2,700 gallons	pigment, resin, solvent	S001 S003
	Blenders #1-7	Paint Plant RTO / Environ Baghouse	5,200 gallons ea.	pigment, resin, solvent	S001 S003
	Blender #8	Paint Plant RTO / Environ Baghouse	3,800 gallons	pigment, resin, solvent	S001 S003
	Tanks 9-14	Paint Plant RTO / Environ Baghouse	4,250 gallons ea.	pigment, resin, solvent	S001 S003
	25 hp Cowles	Environ Baghouse	n/a (portable tanks)	pigment, resin, solvent	S003

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	Mill – PM-10		45 liter & portable tanks	pigment, resin, solvent	
P001 P002	Solvent Still				
	Solvent Still Vaporizer – Tank 101	Paint Plant RTO	4,000 gallons	waste solvent	S001
	Solvent Still Decanter – Tank 601	Paint Plant RTO	1,000 gallons	waste solvent	S001
	Solvent Still Receiver – Tank 102	Paint Plant RTO	3,000 gallons	waste solvent	S001
	Solvent Still Separator – Tank 207	Paint Plant RTO	200 gallons	waste solvent	S001
	Solvent Still Condenser	n/a	n/a	waste solvent	S001
P001 P002	PVC Product Line				
	Coaxial Tank	Paint Plant RTO / PVC Line Baghouse	2,500 gallons	pigment, resin, solvent	S001 S005
	3 – Bulk Dispense Tanks, PVC 101-103	Paint Plant RTO	3,900 gallons ea.	pigment, resin, solvent	S001
	4 – Thin Tanks, PVC 104-107	Paint Plant RTO	3,900 gallons ea.	pigment, resin, solvent	S001
P001 P002	Dispersion				
	2 – PM11& PM12 Mill (Light/Dark)	Paint Plant RTO / PVC Line Baghouse	25 liters ea.	pigment, resin, solvent	S001 S005
	1 – PM13 Mill (Small)	Paint Plant RTO / PVC Line Baghouse	10 liters	pigment, resin, solvent	S001 S005
	1 – Basket Mill	Paint Plant RTO / PVC Line Baghouse	80-220 gallons	pigment, resin, solvent	S001 S005
	20 hp Cowles	Paint Plant RTO / PVC Line Baghouse	n/a (portable tanks)	pigment, resin, solvent	S001 S005
	10 hp Cowles	Paint Plant RTO / PVC Line Baghouse	n/a (portable tanks)	pigment, resin, solvent	S001 S005
P001 P002	Small Order Department				
	3 – 15 hp Cowles	Paint Plant RTO / PVC Line Baghouse	n/a (portable tanks)	pigment, resin, solvent	S001 S005
P001 P002	EMG				
	3 – 15 hp Cowles	Ohio Blowpipe	n/a (portable tanks)	pigment, resin, solvent	S002
	3 Roll Mill			pigment, resin, solvent	
	Tank	Paint Plant RTO	200 gallons	pigment, resin, solvent	S001
	Tank	Paint Plant RTO	300 gallons	pigment, resin, solvent	S001
P003	Freightliner Spray Booth	Spray Booth Filters; Electrostatic Spray Guns	n/a	Coatings and cleaning solvent	2004B1

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
P006	Automated Paint Spray Booth (HOPE)	none	5,000 gal/yr	pigment, resin, solvent	S006
Development Center					
P004 P005	K13/K15 Resin Process				
	K13 Reactor	Development Center RTO, Carbon Bins (for back-up only)	1,350 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	S004, S-D60-62, S-D70
	K13 Thin Tank (BT-102)	Development Center RTO, Carbon Bins (for back-up only)	4,070 gallons	solvent, water, resin, additives	S004, S-D60-62, S-D70
	K13 Monomer Tank	Development Center RTO, Carbon Bins (for back-up only)	1,060 gallons	solvent, monomers, catalyst	S004, S-D60-62, S-D70
	K13 Catalyst Tank	Development Center RTO, Carbon Bins (for back-up only)	350 gallons	solvent, catalyst	S004, S-D60-62, S-D70
	K15 Reactor	Development Center RTO, Carbon Bins (for back-up only)	1,450 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	S004, S-D60-62, S-D70
	K15 Thin Tank (TR-3800)	Development Center RTO, Carbon Bins (for back-up only)	3,800 gallons	solvent, resin, epoxy, isocyanates, monomers, water	S004, S-D60-62, S-D70
	K15 Feed Tank	Development Center RTO, Carbon Bins (for back-up only)	1,000 gallons	solvent, epoxy, isocyanates, monomers	S004, S-D60-62, S-D70
	K15 Amine Tank	Development Center RTO, Carbon Bins (for back-up only)	250 gallons	solvent, amines, catalyst	S004, S-D60-62, S-D70
P004 P005	Large Side Reactor System				
	K500A Reactor	Development Center RTO, Large Side Scrubber	482 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500A Thin Tank (TR-1200)	Development Center RTO, Large Side Scrubber (for back-up only)	1,190 gallons	solvent, resin, epoxy, isocyanates, monomers	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500A Monomer Tank	Development Center RTO, Large Side Scrubber (for back-up only)	500 gallons	solvent, monomers, catalyst	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500A Catalyst Tank	Development Center RTO, Large Side Scrubber (for back-up only)	120 gallons	solvent, catalyst	S004, S-D05, 08, 26-30, 51, 60-63, 70

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	K500B Reactor	Development Center RTO, Large Side Scrubber (for back-up only)	480 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500B Thin Tank (HT-1500)	Development Center RTO, Large Side Scrubber (for back-up only)	1,500 gallons	solvent, resin, epoxy, isocyanates, monomers, water	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500B Monomer Tank	Development Center RTO, Large Side Scrubber (for back-up only)	500 gallons	solvent, monomers, catalyst	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500B Catalyst Tank	Development Center RTO, Large Side Scrubber (for back-up only)	120 gallons	solvent, catalyst	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500B Amine Tank 1	Development Center RTO, Large Side Scrubber (for back-up only)	30 gallons	solvent, amines	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500B Amine Tank 2	Development Center RTO, Large Side Scrubber (for back-up only)	30 gallons	solvent, amines	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500B Crosslinker Tank	Development Center RTO, Large Side Scrubber (for back-up only)	300 gallons	solvent, resin	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500F Reactor	Development Center RTO, Large Side Scrubber (for back-up only)	500 gallons	solvent, epoxy, catalyst, alcohols, isocyanates, monomers	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500F Thin Tank (TR-750)	Development Center RTO, Carbon Bins (for back-up only)	750 gallons	solvent, resin, additives	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K500G Solvent Still	Development Center RTO / Carbon Bins / Large Side Scrubber	500 gallons	solvent, waste solvent	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K300 Reactor	Development Center RTO / Carbon Bins / Large Side Scrubber	300 gallons	solvent, epoxy, catalyst, alcohols, isocyanates, monomers	S004, S-D05, 08, 26-30, 51, 60-63, 70
	K300 Thin Tank (BT-500)	Development Center RTO / Carbon Bins / Large Side Scrubber	500 gallons	solvent, resin	S004, S-D05, 08, 26-30, 51, 60-63, 70

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	Large Side Condensers	Development Center RTO / Carbon Bins / Large Side Scrubber	Sizes range from 20 to 200 square feet surface area (not liquid full)	solvent, monomers, water	S004, S-D05, 08, 26-30, 51, 60-63, 70
	Large Side Decanters	Development Center RTO / Carbon Bins / Large Side Scrubber	Sizes range from 2 to 4 gallons	solvent, water	S004, S-D05, 08, 26-30, 51, 60-63, 70
P004 P005	LUWA Filmtruder				
	LUWA Filmtruder	Development Center RTO / Carbon Bins		powder coating resin, solvent	S004 S-D61-62
	LUWA Drum Flaker	n/a		100% solid resin	
	LUWA Condenser	Development Center RTO / Carbon Bins	68 square feet surface area (not liquid full)	solvent	S004 S-D61-62
	LUWA Distillate Receiver	Development Center RTO / Carbon Bins	100 gallons	solvent	S004 S-D61-62
P004 P005	R2000 Reactor Process				
	R2000 Reactor	Development Center RTO, Carbon Bins (for back-up only)	2,000 gallons	solvent, epoxy, catalyst, alcohols, isocyanates, monomers	S004
	R2000 Pre-Reactor	Development Center RTO, Carbon Bins (for back-up only)	1,600 gallons	solvent, epoxy, catalyst, alcohols, isocyanates, monomers	S004
	R2000 Thin Tank (TR-5000)	Development Center RTO, Carbon Bins (for back-up only)	5,000 gallons	solvent, resin, additives, epoxy, catalyst, monomers, isocyanates, water	S004
	R2000 Monomer Feed Tank	Development Center RTO, Carbon Bins (for back-up only)	1,000 gallons	solvent, monomers catalyst,	S004
	R2000 Catalyst Feed Tank	Development Center RTO, Carbon Bins (for back-up only)	400 gallons	solvent, catalyst	S004
	R2000 Distillate Tank	Development Center RTO, Carbon Bins (for back-up only)	400 gallons	solvent, water	S004
	BS6200 Batch Stripper	Development Center RTO, Carbon Bins (for back-up only)	6,250 gallons	solvent, resin	S004
	BS6200 Condenser	Development Center RTO, Carbon Bins (for back-up only)	1280 square feet surface area (not liquid full)	solvent, water	S004
	BS6200 Decanter	Development Center RTO, Carbon Bins (for back-up only)	72 gallons	solvent, water	S004

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	BS6200 Receiver Tank	Development Center RTO, Carbon Bins (for back-up only)	590 gallons	solvent	S004
P004 P005	BS5000 Resin Stripper				
	BS5000 Batch Stripper	Development Center RTO, Carbon Bins (for back-up only)	5,000 gallons	solvent, resin	S004 S-D61-62
	BS5000 Condenser	Development Center RTO, Carbon Bins (for back-up only)	500 square feet surface area (not liquid full)	solvent, water	S004 S-D61-62
	BS5000 Decanter	Development Center RTO, Carbon Bins (for back-up only)	60 gallons	solvent, water	S004 S-D61-62
	BS5000 Receiver	Development Center RTO, Carbon Bins (for back-up only)	500 gallons	solvent, water	S004 S-D61-62
P005	Small Side Reactor System				
	K100 Reactor	Condenser, RTO (vacuum only)	100 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	--
	K100 Thin Tank (TR-250)	Condenser	250 gallons	solvent, resin, epoxy, isocyanates, monomers	--
	K100 Monomer Tank		80 gallons	solvent, monomers, catalyst, isocyanates	--
	K100 Surfactant Tank		55 gallons	solvent, monomers, catalyst, isocyanates	--
	K100 Catalyst Tank		20 gallons	solvent, catalyst	--
	K65B Reactor	Condenser, RTO (vacuum only)	65 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	--
	K65B Thin Tank (BT-100)	Condenser	100 gallons	solvent, resin	--
	K65C Reactor	Condenser, RTO (vacuum only)	65 gallons	solvent, catalyst, monomers epoxy, isocyanates, amines, alcohols,	--
	K65C Thin Tank (TR-170)	Condenser	170 gallons	solvent, resin, epoxy, isocyanates, monomers	--
	K65C Monomer Tank		55 gallons	solvent, monomers, catalyst, isocyanates	--
	K65C Catalyst Tank		20 gallons	solvent, catalyst	--
	K50 Reactor	Condenser, RTO (vacuum only)	50 gallons	solvent, catalyst, monomers, epoxy, isocyanates, amines, alcohols,	--

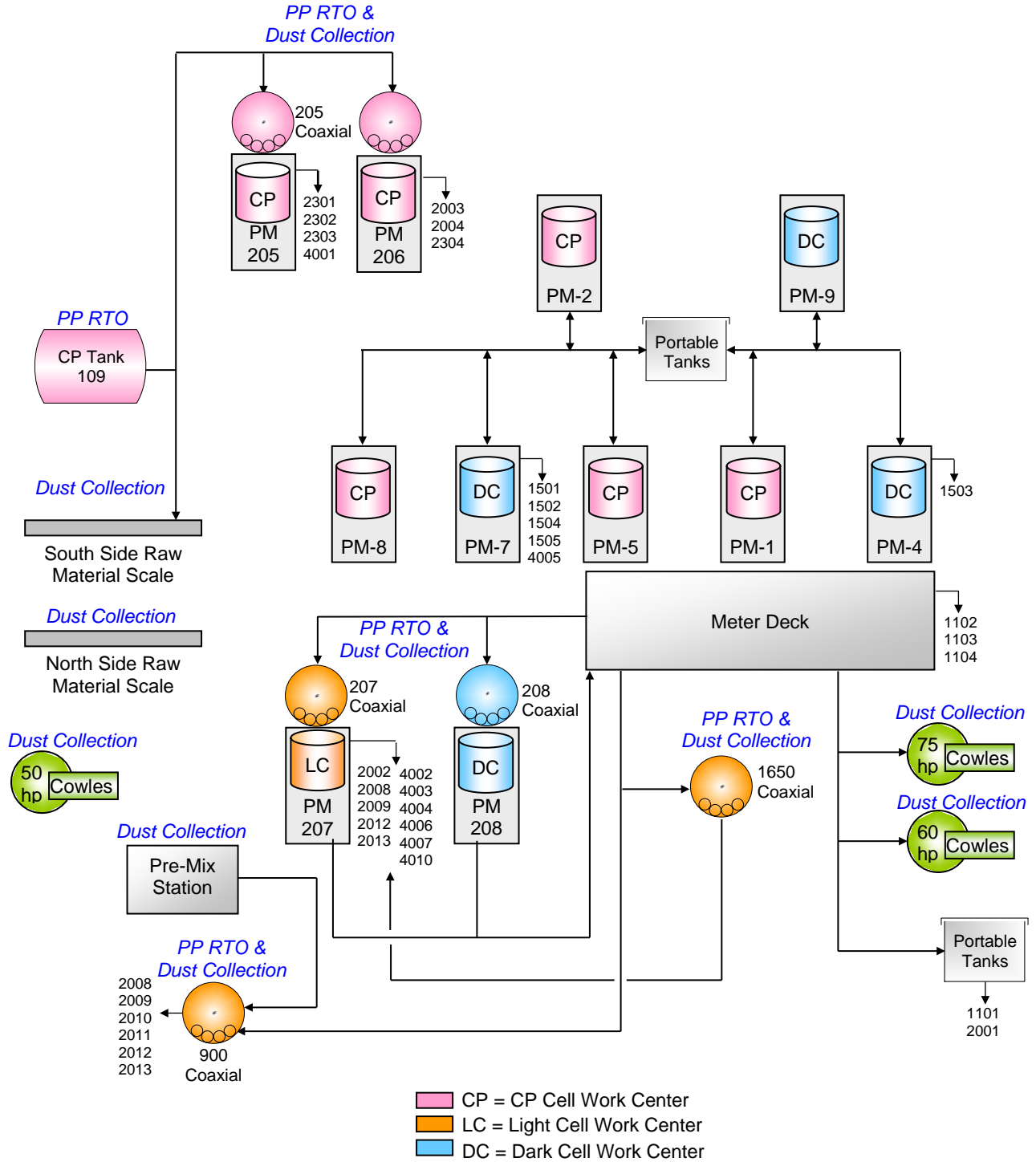
I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	K50 Thin Tank (TR-125)	Condenser, RTO (vacuum only)	125 gallons	solvent, resin	--
	R5 Reactor	Vents through Flash Tank – Carbon Beds/ RTO	5 gallons	solvent, catalyst, monomers	--
	R5 Flash Tank	Condenser, Carbon Beds/ RTO	100 gallons	resin, solvent, catalyst, monomers	--
	R5 Monomer Tank		65 gallons	monomers, solvent	--
	R5 Monomer Feed Tank (K500D)	Development Center RTO, Carbon Bins (for back-up only)	500 gallons	monomers, solvent	--
	R5 Initiator Tank		10 gallons	solvent, catalyst	--
	R5 Post Initiator Tank		5 gallons	solvent, catalyst	--
Boilers					
B001	Boiler #1a	none	25.1 MMBtu/hr	natural gas, no.2 fuel oil	SB01A
B002	Boiler #2	none	25.1 MMBtu/hr	natural gas, no.2 fuel oil	SB02
B003	Warehouse Boiler	none	8.4 MMBtu/hr	natural gas, no.2 fuel oil	SWHB1
Paint Plant Storage Tanks					
	Tanks 103-104	none	30,000 gal. ea.	waste solvent	--
	Tank 224	none	25,000 gal.	resin	--
	Tank 225	none	30,000 gal.	resin	--
	Tanks 301-302	none	25,000 gal. ea.	solvent	--
	Tank 303	none	12,000 gal.	solvent, raw material	--
	Tanks 305-308	none	12,000 gal. ea.	solvent, raw material	--
	Tanks 311-314	none	12,000 gal. ea.	solvent, raw material	--
	Tank 320	none	25,000 gal.	solvent, raw material	--
	Tank 321 & 324	none	10,000 gal. ea.	solvent, raw material	--
	Tank 322	none	20,000 gal.	solvent, raw material	--
	Tank 329	none	30,000 gal. ea.	cleaning solvent	--
	Tank 410A	none	7,500 gal.		

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
Development Center Storage Tanks					
	Tanks 1, 3-5	none	5,200 gal. ea.	monomer solution, solvent	--
	Tank 2	none	5,200 gal.	monomer solution, solvent	--
	Tanks 6-8, BT122, BT126	none	5,000 gal. ea.	cleaning solvent	--
	Tanks BT 101, BT 112, BT 120, BT 4000	none	5,000 gal. ea.	waste solvent	

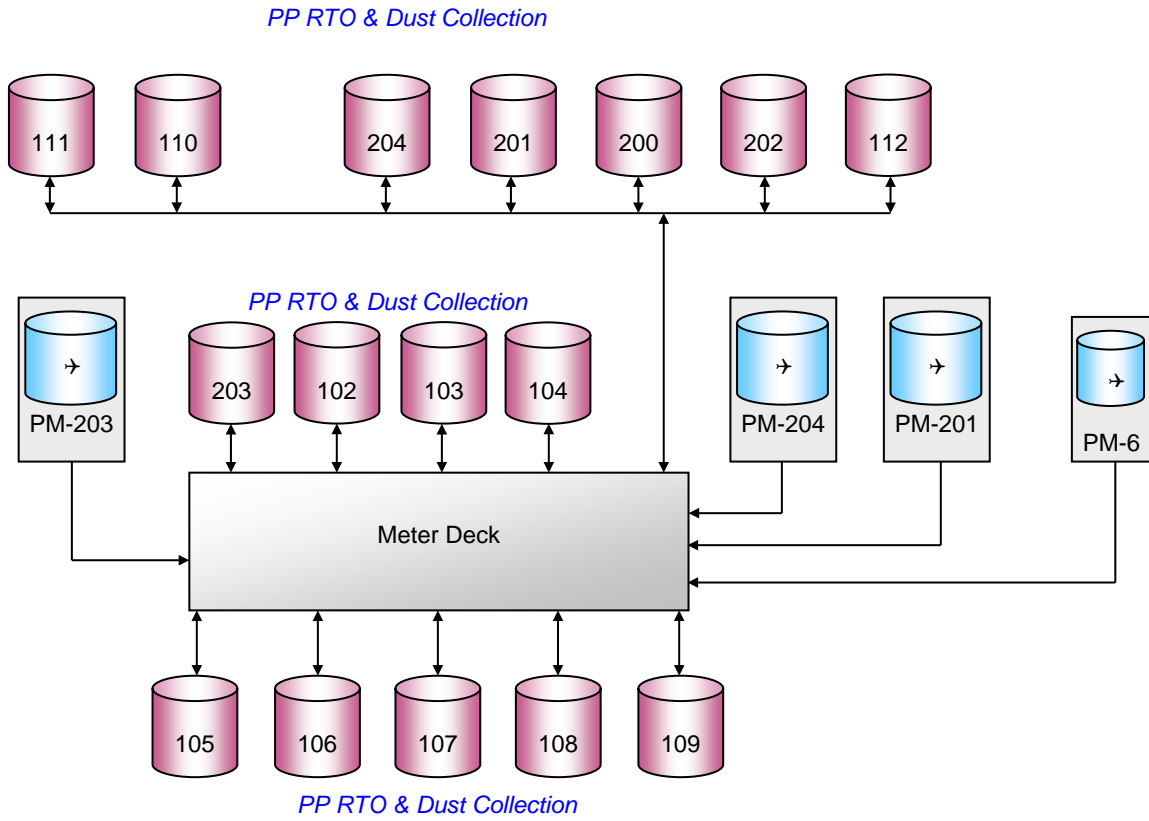
[See flow diagrams below.]

A. Process Flow Diagrams

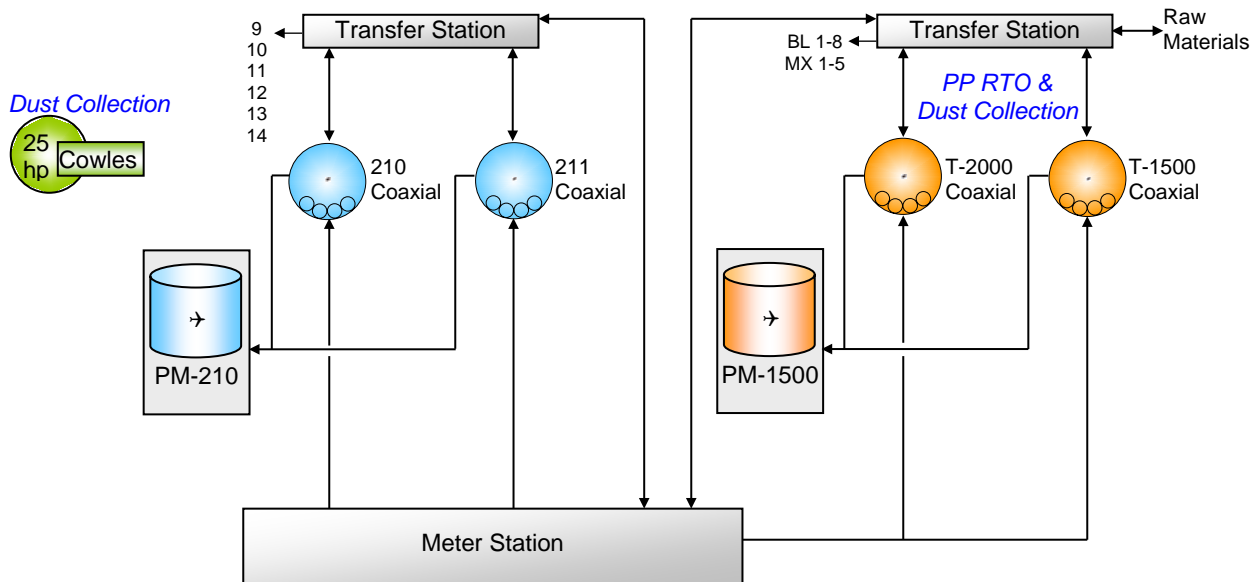
Paint Plant – 2nd Floor (excluding Large Batch Center)



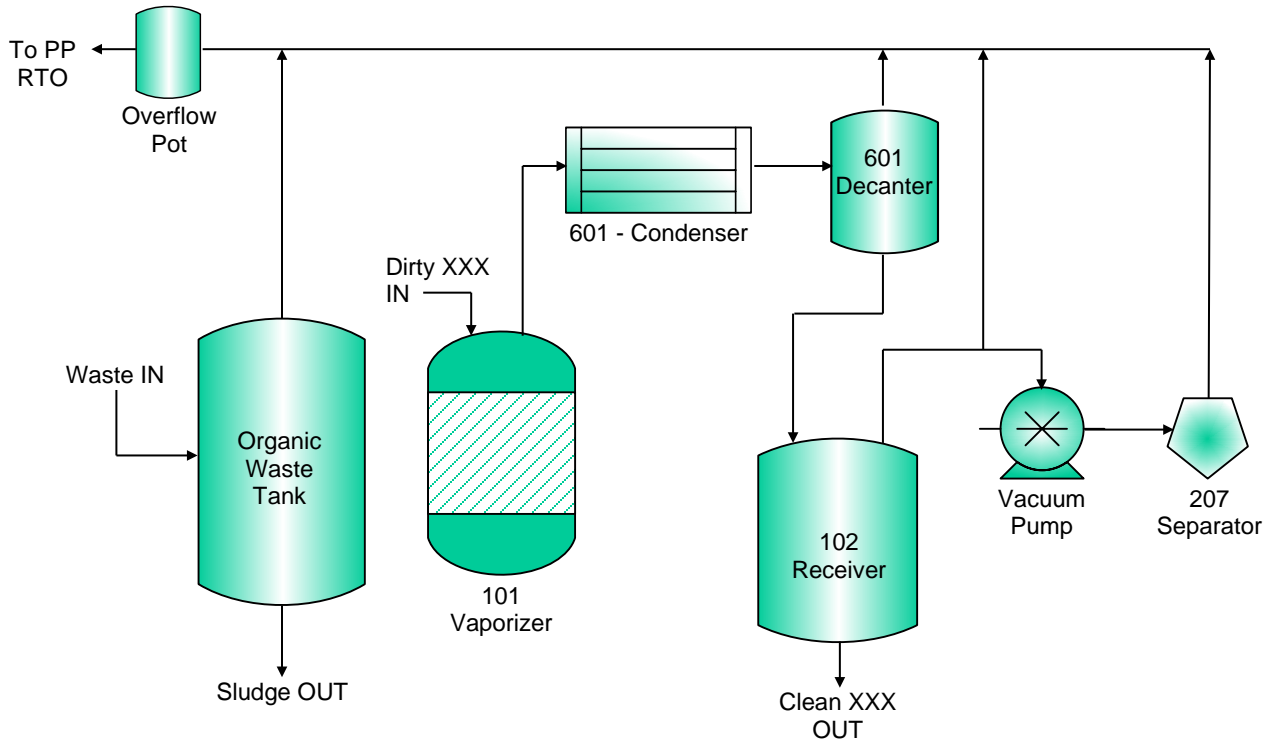
Paint Plant – Large Batch Center



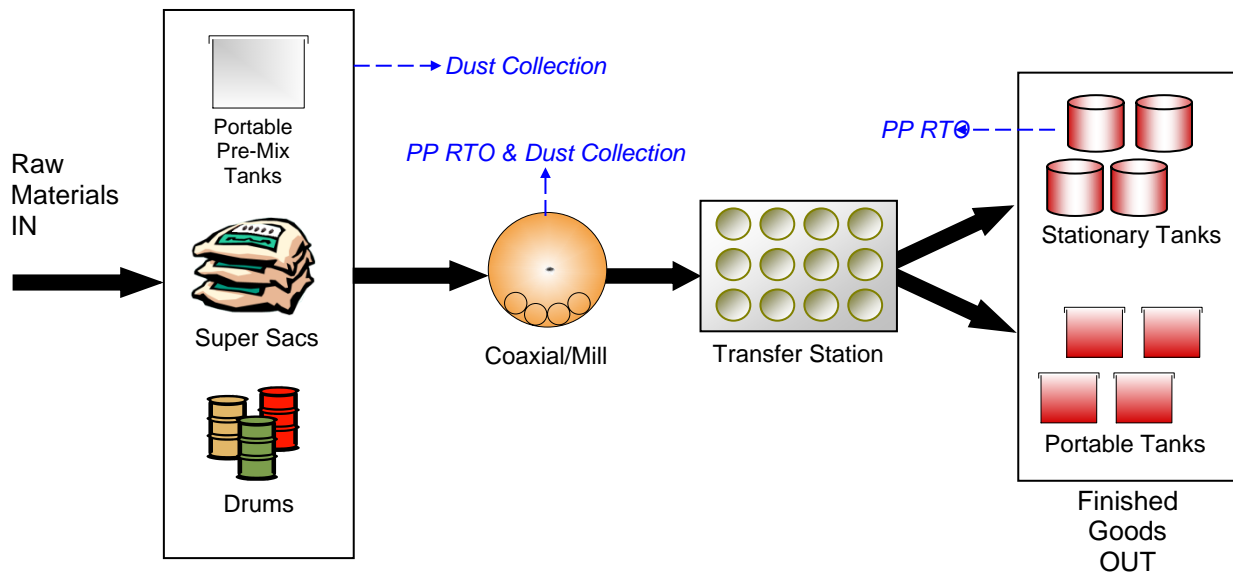
Paint Plant – Environ Work Center



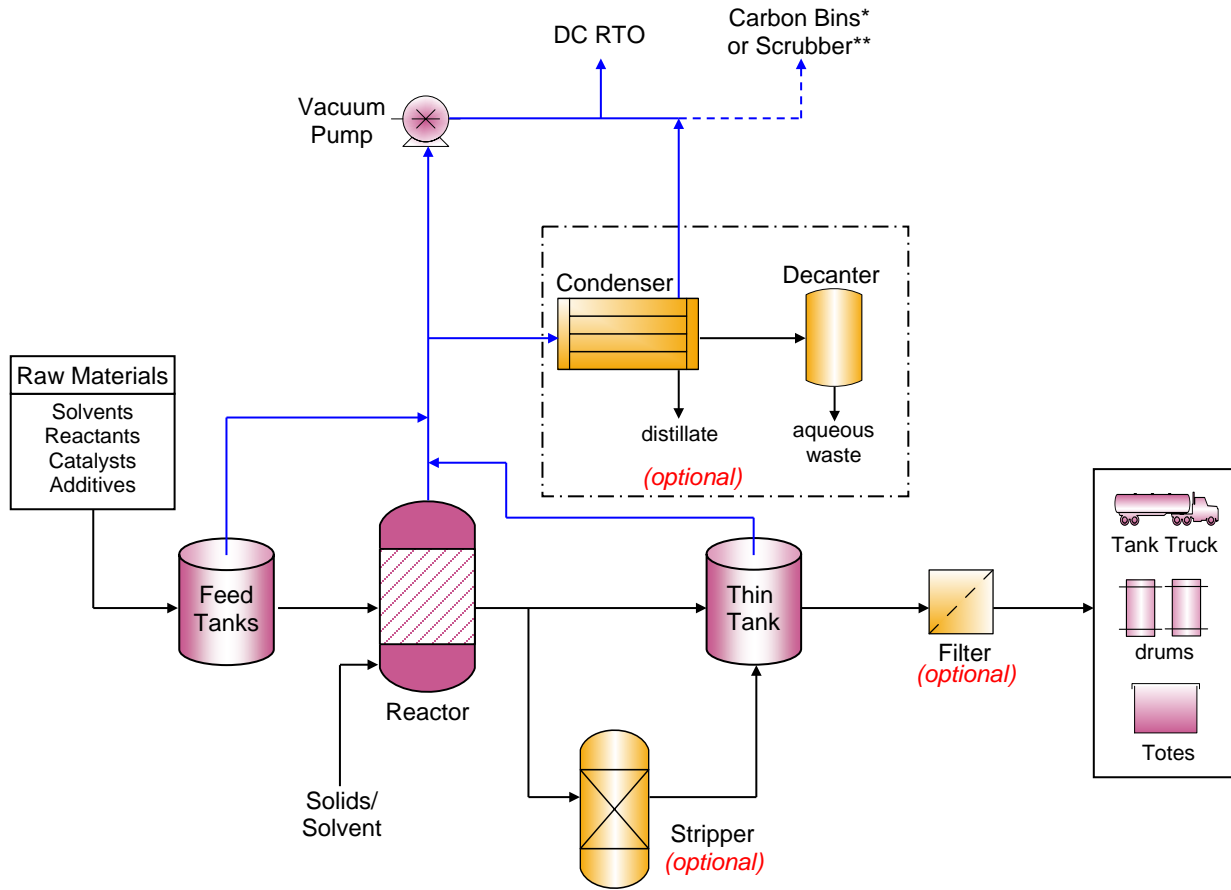
Paint Plant – Solvent Still



Paint Plant – Typical Coaxial Arrangement

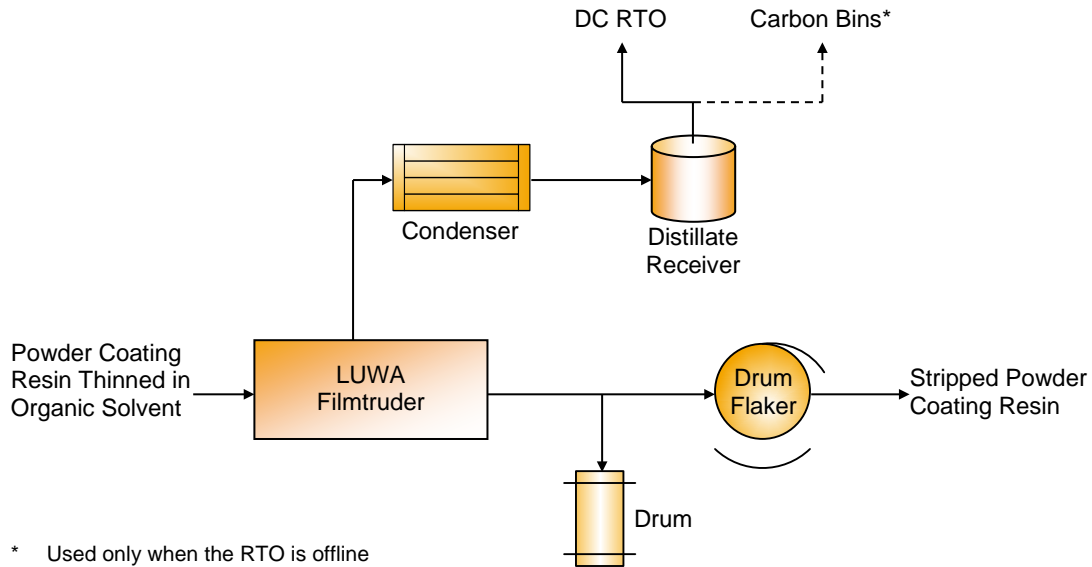


Development Center – Typical Reactor Arrangement

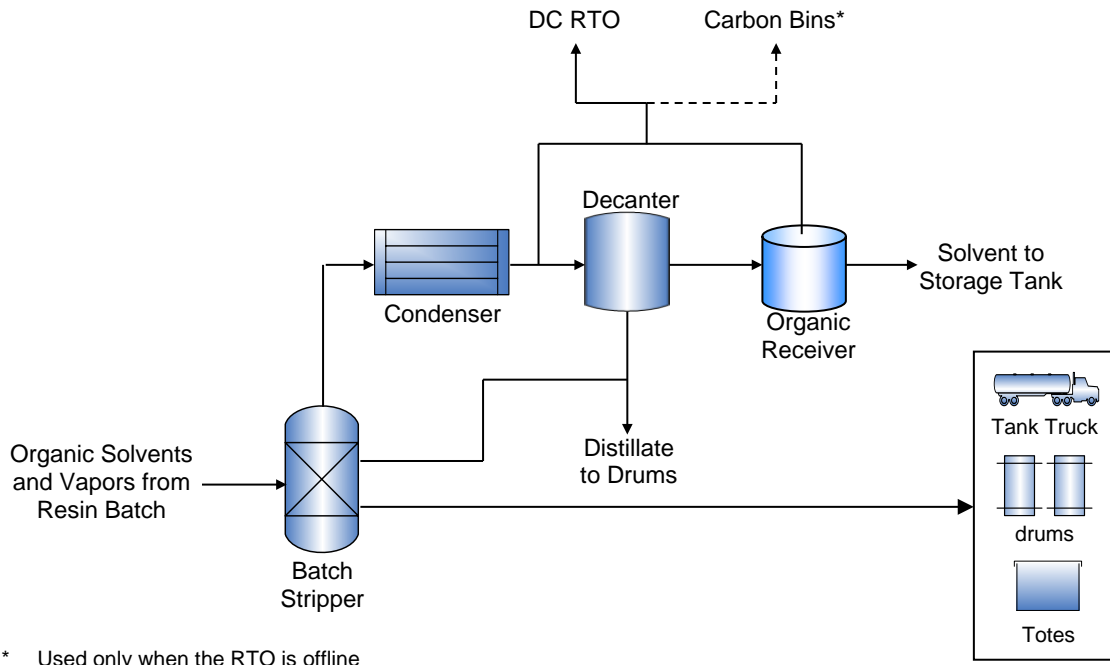


- * Used only if the RTO is offline
- ** Used only if the RTO is offline or if processing ammonia batches

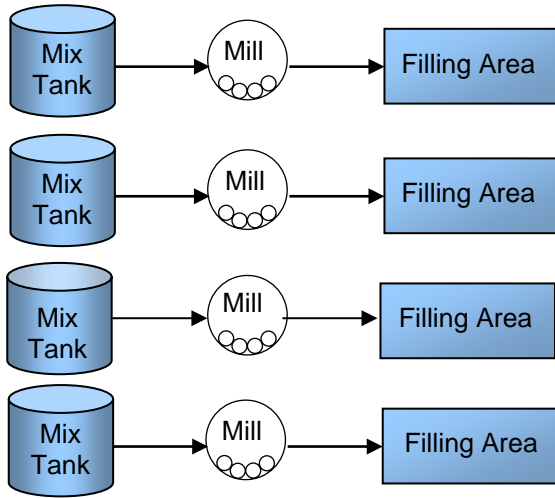
Development Center – LUWA Filmtruder



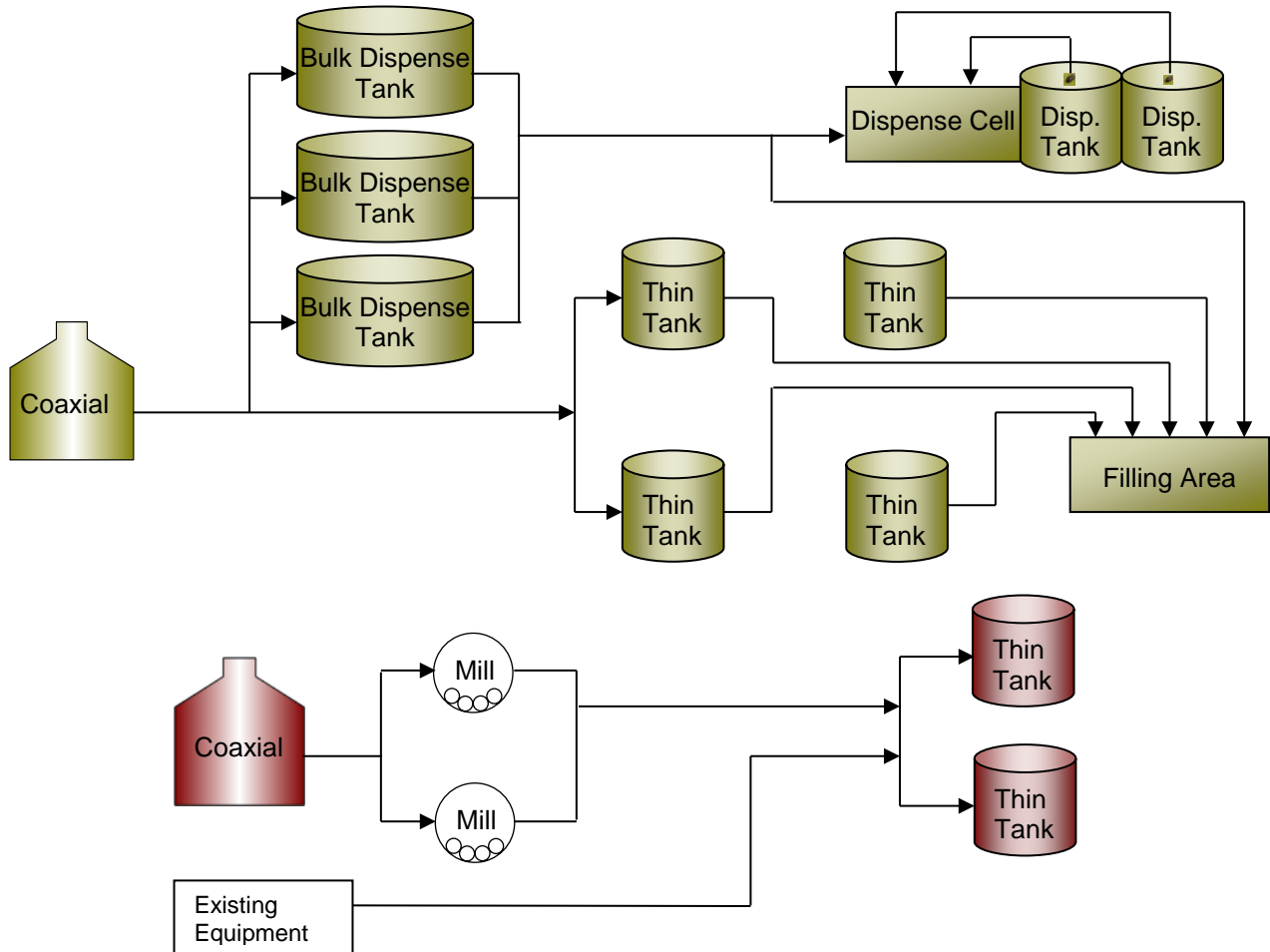
Development Center – Batch Stripper (BS5000)



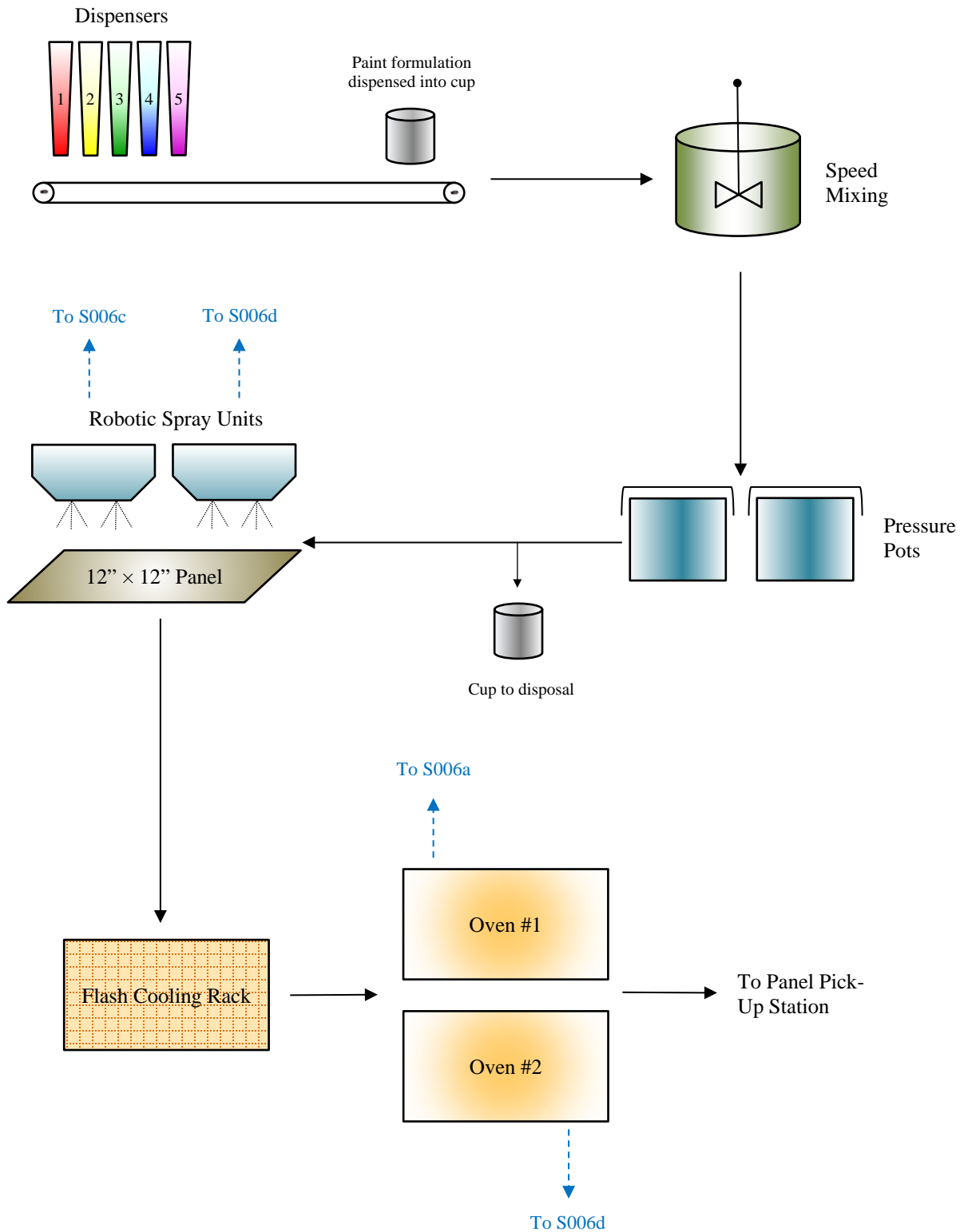
Equipment Dedicated to New Tint Line



Equipment Dedicated to PVC Product Line



Automated Paint Spray Process



DECLARATION OF POLICY

Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.

The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.

III. GENERAL CONDITIONS – Major Source**1. Prohibition of Air Pollution (§2101.11)**

It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

2. Definitions (§2101.20)

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.
- b. Unless specified otherwise in this permit or in the applicable regulation, the term “year” shall mean any twelve (12) consecutive months.

3. Conditions (§2102.03.c)

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

4. Certification (§2102.01)

Any report, or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

5. Transfers (§2102.03.e)

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b. The required documentation and fee must be received by the Department at least 30 days before the intended transfer date.

6. Term (§2103.12.e, §2103.13.a)

- a. This permit shall remain valid for five (5) years from the date of issuance, or such other shorter period if required by the Clean Air Act, unless revoked. The terms and conditions of an expired permit shall automatically continue pending issuance of a new operating permit provided the permittee has submitted a timely and complete application and paid applicable fees required under Article XXI Part C, and the Department through no fault of the permittee is unable to issue or deny a new permit before the expiration of the previous permit.
- b. Expiration. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with the requirements of Article XXI Part C.

7. Need to Halt or Reduce Activity Not a Defense (§2103.12.f.2)

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

8. Property Rights (§2103.12.f.4)

This permit does not convey any property rights of any sort, or any exclusive privilege.

9. Duty to Provide Information (§2103.12.f.5)

- a. The permittee shall furnish to the Department in writing within a reasonable time, any information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of any records required to be kept by the permit.
- b. Upon cause shown by the permittee the records, reports, or information, or a particular portion thereof, claimed by the permittee to be confidential shall be submitted to the Department in accordance with the requirements of Article XXI, §2101.07.d.4. Information submitted to the Department under a claim of confidentiality, shall be available to the US EPA and the PADEP upon

request and without restriction. Upon request of the permittee the confidential information may be submitted to the USEPA and PADEP directly. Emission data or any portions of any draft, proposed, or issued permits shall not be considered confidential.

10. Modification of Section 112(b) Pollutants which are VOCs or PM₁₀ (§2103.12.f.7)

Except where precluded under the Clean Air Act or federal regulations promulgated under the Clean Air Act, if this permit limits the emissions of VOCs or PM₁₀ but does not limit the emissions of any hazardous air pollutants, the mixture of hazardous air pollutants which are VOCs or PM₁₀ can be modified so long as no permit emission limitations are violated. A log of all mixtures and changes shall be kept and reported to the Department with the next report required after each change.

11. Right to Access (§2103.12.h.2)

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized Department and other federal, state, county, and local government representatives to:

- a. Enter upon the permittee's premises where a permitted source is located or an emissions-related activity is conducted, or where records are or should be kept under the conditions of the permit;
- b. Have access to, copy and remove, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by either Article XXI or the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

12. Certification of Compliance (§2103.12.h.5.)

- a. The permittee shall submit on an annual basis, certification of compliance with all terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification of compliance shall be made consistent with General Condition 4 above and shall include the following information at a minimum:
 - 1) The identification of each term or condition of the permit that is the basis of the certification;
 - 2) The compliance status;
 - 3) Whether any noncompliance was continuous or intermittent;
 - 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the provisions of this permit; and
 - 5) Such other facts as the Department may require to determine the compliance status of the source.
- b. All certifications of compliance must be submitted to the Administrator as well as the Department by May 30 of each year for the time period beginning April 1 of the previous year and ending March 31 of the same year. Compliance certifications may be emailed to the Administrator at R3_APD_Permits@epa.gov in lieu of mailing a hard copy.

13. Record Keeping Requirements (§2103.12.j.1)

- a. The permittee shall maintain records of required monitoring information that include the following:

- 1) The date, place as defined in the permit, and time of sampling or measurements;
 - 2) The date(s) analyses were performed;
 - 3) The company or entity that performed the analyses;
 - 4) The analytical techniques or methods used;
 - 5) The results of such analyses; and
 - 6) The operating parameters existing at the time of sampling or measurement.
- b. The permittee shall maintain and make available to the Department, upon request, records including computerized records that may be necessary to comply with the reporting and emission statements in Article XXI §2108.01.e. Such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

14. Retention of Records (§2103.12.j.2)

The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

15. Reporting Requirements (§2103.12.k)

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.
- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
 - 1) One semiannual report is due by October 31 of each year for the time period beginning April 1 and ending September 30.
 - 2) One semiannual report is due by April 30 of each year for the time period beginning October 1 and ending March 31.
- e. Reports may be submitted electronically to AQReports@AlleghenyCounty.us. Certification by the responsible official in accordance with General Condition III.4 above shall be provided separately via hard copy.

16. Severability Requirement (§2103.12.l)

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

17. Existing Source Reactivations (§2103.13.d)

The permittee shall not reactivate any source that has been out of operation or production for a period of one year or more unless the permittee has submitted a reactivation plan request to, and received a written reactivation plan approval from, the Department. Existing source reactivations shall meet all requirements of Article XXI §2103.13.d.

18. Administrative Permit Amendment Procedures (§2103.14.b)

An administrative permit amendment may be made consistent with the procedures of Article XXI §2103.14.b and §2103.24.b. Administrative permit amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations there under.

19. Revisions and Minor Permit Modification Procedures (§2103.14.c)

Sources may apply for revisions and minor permit modifications on an expedited basis in accordance with Article XXI §2103.14.c and §2103.24.a.

20. Significant Permit Modifications (§2103.14.d)

Significant permit modifications shall meet all requirements of the applicable subparts of Article XXI, Part C, including those for applications, fees, public participation, review by affected States, and review by EPA, as they apply to permit issuance and permit renewal. The approval of a significant permit modification, if the entire permit has been reopened for review, shall commence a new full five (5) year permit term. The Department shall take final action on all such permits within nine (9) months following receipt of a complete application.

21. Duty to Comply (§2103.12.f.1)

The permittee shall comply with all permit conditions and all other applicable requirements at all times. Any permit noncompliance constitutes a violation of the Clean Air Act, the Air Pollution Control Act, and Article XXI and is grounds for any and all enforcement action, including, but not limited to, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

22. Renewals (§2103.13.b.)

Renewal of this permit is subject to the same fees and procedural requirements, including those for public participation and affected State and EPA review, that apply to initial permit issuance. The application for renewal shall be submitted at least six (6) months but not more than eighteen (18) months prior to expiration of this permit. The application shall also include submission of a supplemental compliance review as required by Article XXI §2102.01.

23. Reopenings for Cause (§2103.15, §2103.12.f.3)

- a. This permit shall be reopened and reissued under any of the following circumstances:
 - 1) Additional requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three (3) or more years. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended solely due to the failure of

the Department to act on a permit renewal application in a timely fashion.

- 2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
 - 3) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
 - 4) The Administrator or the Department determines that this permit must be reissued or revoked to assure compliance with the applicable requirements.
- b. This permit may be modified; revoked, reopened, and reissued; or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in this permit.

24. Reopenings for Cause by the EPA (§2103.25.b)

This permit may be modified, reopened and reissued, revoked or terminated for cause by the EPA in accordance with procedures specified in Article XXI §2103.25.b.

25. Annual Operating Permit Administration Fee (§2103.40)

In each year during the term of this permit, on or before the last day of the month in which the application for this permit was submitted, the permittee shall submit to the Department, in addition to any other applicable administration fees, an Annual Operating Permit Administration Fee in accordance with §2103.40. by check or money order payable to the “Allegheny County Air Pollution Control Fund” in the amount specified in the fee schedule applicable at that time.

26. Annual Major Source Emissions Fees Requirements (§2103.41)

No later than September 1 of each year, the permittee shall pay an annual emission fee in accordance with Article XXI §2103.41 for each ton of a regulated pollutant (except for carbon monoxide) actually emitted from the source. The permittee shall not be required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant. The emission fee shall be increased in each year after 1995 by the percentage, if any, by which the Consumer Price Index for the most recent calendar year exceeds the Consumer Price Index for the previous calendar year.

27. Other Requirements not Affected (§2104.08, §2105.02)

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable Federal, State, or County statute, rule, regulation, or the like, including but not limited to the odor emission standards under Article XXI §2104.04, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology (GACT) standards now or hereafter established by the EPA, and any applicable requirements of BACT or LAER as provided by Article XXI, any condition contained in any applicable Installation or Operating Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Article XXI Part I.

28. Termination of Operation (§2108.01.a)

In the event that operation of any source of air contaminants is permanently terminated, the person responsible for such source shall so report, in writing, to the Department within 60 days of such termination.

29. Emissions Inventory Statements (§2108.01.e & g)

- a. Emissions inventory statements in accordance with Article XXI §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.
- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

30. Tests by the Department (§2108.02.d)

Notwithstanding any tests conducted pursuant to Article XXI §2108.02, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the person responsible for such source or equipment shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.

31. Other Rights and Remedies Preserved (§2109.02.b)

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit.

32. Enforcement and Emergency Orders (§2109.03, §2109.05)

- a. The person responsible for this source shall be subject to any and all enforcement and emergency orders issued to it by the Department in accordance with Article XXI §2109.03, §2109.04 and §2109.05.
- b. Upon request, any person aggrieved by an Enforcement Order or Emergency Order shall be granted a hearing as provided by Article XXI §2109.03.d; provided however, that an Emergency Order shall continue in full force and effect notwithstanding the pendency of any such appeal.
- c. Failure to comply with an Enforcement Order or immediately comply with an Emergency Order shall be a violation of this permit thus giving rise to the remedies provided by Article XXI §2109.02.

33. Penalties, Fines, and Interest (§2109.07.a)

A source that fails to pay any fee required under this permit when due shall pay a civil penalty of 50% of the fee amount, plus interest on the fee amount computed in accordance with Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have this permit revoked for failure to pay any fee required.

34. Appeals (§2109.10)

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI or any unsuccessful petitioner to the Administrator under Article XXI Part C, Subpart 2, shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

35. Risk Management (§2104.08, 40 CFR Part 68)

Should this stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by General Condition III.12 above.

36. Permit Shield (§2103.22)

- a. The permittee's compliance with the conditions of this permit shall be deemed compliance with all major source applicable requirements as of the date of permit issuance, provided that:
 - 1) Such major source applicable requirements are included and are specifically identified in the permit; or
 - 2) The Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in Article XXI §2103.22.e or the Title V Permit shall alter or affect the following:
 - 1) The provisions of Section 303 of the Clean Air Act and the provisions of Article XXI regarding emergency orders, including the authority of the Administrator and the Department under such provisions;
 - 2) The liability of any person who owns, operates, or allows to be operated, a source in violation of any major source applicable requirements prior to or at the time of permit issuance;
 - 3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or
 - 4) The ability of the EPA or the County to obtain information from the permittee pursuant to Section 114 of the Clean Air Act, the provisions of Article XXI and State law.
- c. Unless precluded by the Clean Air Act or regulations therein, final action by the Department on administrative amendments, minor and significant permit modifications, and operational flexibility changes shall be covered by the permit shield provided such amendments, modifications and changes meet the relevant requirements of Article XXI.
- d. The permit shield authorized under Article XXI §2103.22 is in effect for the permit terms and conditions as identified in this permit.

37. Circumvention (§2101.14)

For purposes of determining compliance with the provisions of this permit and Article XXI, no credit shall be given to any person for any device or technique, including but not limited to the operation of any source

with unnecessary amounts of air, the combining of separate sources except as specifically permitted by Article XXI and the Department, the use of stacks exceeding Good Engineering Practice height as defined by regulations promulgated by the US EPA at 40 CFR §§51.100 and 51.110 and Subpart I, and other dispersion techniques, which without reducing the amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise violate the provisions of this Article; except that, for purposes of determining compliance with Article §2104.04 concerning odors, credit for such devices or techniques, except for the use of a masking agent, may be given.

38. Duty to Supplement and Correct Relevant Facts (§2103.11.d.2)

- a. The permittee shall provide additional information as necessary to address requirements that become applicable to the source after the date it files a complete application but prior to the Department taking action on the permit application.
- b. The permittee shall provide supplementary fact or corrected information upon becoming aware that incorrect information has been submitted or relevant facts were not submitted.
- c. Except as otherwise required by this permit and Article XXI, the Clean Air Act, or the regulations thereunder, the permittee shall submit additional information as necessary to address changes occurring at the source after the date it files a complete application but prior to the Department taking action on the permit application.
- d. The applicant shall submit information requested by the Department which is reasonably necessary to evaluate the permit application.

39. Effect (§2102.03.g.)

- a. Except as specifically otherwise provided under Article XXI, Part C, issuance of a permit pursuant to Article XXI Part B or Part C shall not in any manner relieve any person of the duty to fully comply with the requirements of this permit, Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of this permit or Article XXI, whether occurring before or after the issuance of such permit. Further, except as specifically otherwise provided under Article XXI Part C the issuance of a permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of this permit or Article XXI.

40. Installation Permits (§2102.04.a.1.)

It shall be a violation of this permit giving rise to the remedies set forth in Article XXI Part I for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment which would require an installation permit or permit modification in accordance with Article XXI Part B or Part C.

IV. SITE LEVEL TERMS AND CONDITIONS

1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, no person shall operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

3. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line.

4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

7. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the person responsible for such equipment shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the Department is obtained; provided, however, that no such report shall be required if the source(s)

served by such air pollution control equipment is also shut down at all times that such equipment is shut down.

- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XI.
- c. The prior report required by Site Level Condition IV.7.a above shall include:
 - 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
 - 2) The reasons for the shutdown;
 - 3) The expected length of time that the equipment will be out of service;
 - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
 - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions;
 - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
 - 7) Such other information as may be required by the Department.

8. Breakdowns (§2108.01.c)

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the person responsible for such equipment or source shall immediately, but in no event later than sixty (60) minutes after the commencement of the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.
- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
 - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
 - 2) The nature and probable cause of the breakdown.
 - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
 - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.
 - 5) The estimated quantity of each material being or likely to be emitted.
 - 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.
 - 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is

impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.

- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
- d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
- e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
- f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.

9. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the person responsible for such equipment shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant.

10. Monitoring of Malodorous Matter Beyond Facility Boundaries (§2104.04)

The permittee shall take all reasonable action as may be necessary to prevent malodorous matter from becoming perceptible beyond facility boundaries. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to insure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

11. Orders (§2108.01.f)

In addition to meeting the requirements of General Condition III.28 and Site Level Conditions IV.7 through IV.10 above, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

12. Violations (§2108.01.g)

The failure to submit any report or update thereof required by General Condition III.28 and Site Level Conditions IV.7 through IV.11 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

13. Emissions Testing (§2108.02)

- a. **Orders.** The person responsible for any source shall, upon order by the Department, conduct, or cause to be conducted, such emissions tests as specified by the Department within such reasonable time as is specified by the Department. Test results shall be submitted in writing to the Department within 20 days after completion of the tests, unless a different period is specified in the Department's order. Emissions testing shall comply with all applicable requirements of Article XXI §2108.02.e.
- b. **Tests by the Department:** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements.** No later than 45 days prior to conducting any tests required by this permit, the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.
- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.
- e. **Violations:** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

14. Abrasive Blasting (§2105.51)

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting

complies with all applicable requirements of Article XXI §2105.51.

- b. In addition to complying with all applicable provisions of §2105.51, no person shall conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

15. Asbestos Abatement (§2105.62, §2105.63)

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

16. Protection of Stratospheric Ozone (40 CFR Part 82)

- a. Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - 1) All containers in which a Class I or Class II substance is stored or transported, all products containing a Class I substance, and all products directly manufactured with a process that uses a Class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106;
 - 2) The placement of the required warning statement must comply with the requirements pursuant to §82.108;
 - 3) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110; and
 - 4) No person may modify, remove or interfere with the required warning statement except as described in §82.112.
- b. Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F:
 - 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the prohibitions and required practices pursuant to §82.154 and §82.156;
 - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158;
 - 3) Persons maintaining, servicing, repairing or disposing of appliances, must be certified by an approved technician certification program pursuant to §82.161;
 - 4) Persons maintaining, servicing, repairing or disposing of appliances must certify to the Administrator of the U.S. Environmental Protection Agency pursuant to §82.162;
 - 5) Persons disposing of small appliances, motor vehicle air conditioners (MVAC) and MVAC-like appliances, must comply with the record keeping requirements pursuant to §82.166;
 - 6) Owners of commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156; and
 - 7) Owners or operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- c. If the permittee manufactures, transforms, destroys, imports or exports a Class I or Class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A (Production and Consumption Controls).
- d. If the permittee performs a service on a motor vehicle that involves an ozone-depleting substance,

refrigerant or regulated substitute substance in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B (Servicing of Motor Vehicle Air Conditioners).

- e. The permittee may switch from any ozone-depleting substance to any alternative that is listed as acceptable in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G.

17. Volatile Organic Compound Storage Tanks (§2105.12.a)

No person shall place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure of 1.5 psia or greater under actual storage conditions in any aboveground stationary storage tank having a capacity equal to or greater than 2,000 gallons but less than or equal to 40,000 gallons, unless there is in operation on such tank pressure relief valves which are set to release at the higher of 0.7 psig of pressure or 0.3 psig of vacuum or at the highest possible pressure and vacuum in accordance with State or local fire codes, National Fire Prevention Association guidelines, or other national consensus standard approved in writing by the Department. Petroleum liquid storage vessels that are used to store produced crude oil and condensate prior to lease custody transfer are exempt from these requirements.

18. Fugitive Emissions (§2105.49)

The person responsible for a source of fugitive emissions, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.

19. Episode Plans (§2106.02)

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

20. New Source Performance Standards (§2105.05)

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for any person to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if such person has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. Any person who operates, or allows to be operated, any source subject to any NSPS shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such

standard. All notices, reports, test results and the like as are required by such standard shall be submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.

21. National Emission Standards for Hazardous Air Pollutants (§2104.08)

- a. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart HHHHH – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing for all applicable equipment and processes in the Paint Plant.
- b. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing for all applicable equipment and processes in the Development Center.

22. Facility-wide Emission Limitations

- a. Production of coatings at the Paint Plant facility shall be limited to a total of 20,000,000 gallons during any 12 consecutive months.

23. Greenhouse Gas Reporting (40 CFR Part 98)

If the facility emits 25,000 metric tons or more of carbon dioxide equivalent (CO₂e) in any 12-month period, the facility shall submit reports to the US EPA in accordance with 40 CFR Part 98.

V. EMISSION UNIT LEVEL TERMS AND CONDITIONS**A. Process P001: Paint Plant (Controlled Emissions)**

Process Description:	CP Cell, Light Cell, Dark Cell, and Environ Work Centers; Large Batch Center; Solvent Still, Small Order Department, and Tank Cleaning
Raw Materials:	Pigment, Resin, Solvent
Control Device(s):	Paint Plant Regenerative Thermal Oxidizer (RTO); Ohio Blowpipe Dust Collector; Environ Baghouse
Capacity:	1.6 MMBtu/hr
Fuel:	Natural Gas

1. Restrictions:

- a. The permittee shall not operate any equipment from the CP Cell, Light Cell, Dark Cell, and Environ work centers; Large Batch Center, or Solvent Still at any time while generating VOC emissions unless the Paint Plant RTO is in service and operating properly. [§2103.12.a; IP #0057-I003, VI.1.a; IP #0057-I005c, V.A.1.a]
- b. The permittee shall equip each stationary mixer and stationary process vessel with a tightly fitting vented cover or lid that must be closed at all times when the vessel contains HAP, except for material additions and sampling. [§2103.12.a; §2104.08; §63.8005(a)(1); 40 CFR Part 63 Subpart HHHHH Table 1.2.b.i; RACT Order #254, 1.13, 1.14; 25 Pa. Code §129.99]
- c. The permittee shall not operate or allow to be operated any dispensing or filling systems for solvent-borne coatings unless they are of closed design or minimize free-fall of liquids. [§2103.12.a; RACT Order #254, 1.16 & 1.17; 25 Pa. Code §129.99]
- d. The Paint Plant RTO shall be properly operated and maintained according to good engineering practices (as proscribed in Monitoring Section V.A.3 below), manufacturer's recommendations, and the following conditions at all times while treating process emissions: [§2103.05; §2105.30; IP #0057-I003, VI.1.b; IP #0057-I005c, V.A.1.b]
 - 1) A minimum VOC destruction efficiency of 98% by weight; or [25 Pa. Code §129.99]
 - 2) A VOC concentration less than 20 ppm by volume, dry basis.
- e. The permittee shall reduce emissions of total organic HAP from stationary process vessels by the amount specified in condition V.A.1.d.1) above or greater by venting emissions through the existing Paint Plant regenerative thermal oxidizer (RTO) at all times when paint is being produced. [§2103.12.a; §2104.08; §63.8005(a)(1); 63 Subpart HHHHH Table 1.2.b.i; §63.988(a)(2)]
- f. The RTO shall be operated at a minimum operating temperature of 1,500 °F or the temperature at which a destruction efficiency of 98% is demonstrated during the most recent stack test, whichever is greater. [§2103.05; §2105.30.b; IP #0057-I005c, V.A.1.c; 25 Pa. Code §129.99]
- g. The permittee shall meet the requirements of condition V.A.1.e above for emissions during automatic cleaning operations. [§2103.12.a; §2104.08; §63.8005(a)(1)(ii)]
- h. The permittee shall conduct all process equipment cleaning so as to minimize VOC emissions. [§2103.12.a; RACT Order #254, 1.20; 25 Pa. Code §129.99]

- i. The permittee shall not operate or allow to be operated any grinding mills unless they are completely closed at all times. [§2103.12.a; RACT Order #254, 1.18]
- j. The permittee shall not operate, nor allow to be operated, the Paint Plant RTO using a fuel other than utility-grade natural gas. [§2103.12.a.2.B; IP #0057-I005c, V.A.1.e]
- k. Emissions from the Paint Plant RTO shall not exceed the limits in Table V-A-1 at any time: [§2103.12.a; IP #0057-I005c, V.A.1.d]

Table V-A-1: Paint Plant RTO Emission Limitations

Pollutant	Hourly Emissions (lb/hr)	Yearly Emissions (tons/yr)¹
Particulate Matter	0.013	0.056
Particulate Matter < 10 µm (PM ₁₀)	0.013	0.056
Particulate Matter < 2.5 µm (PM _{2.5})	0.013	0.056
Nitrogen Oxides (NO _x)	0.180	0.790
Sulfur Oxides (SO _x)	0.001	0.005
Carbon Monoxide (CO)	0.152	0.664
Volatile Organic Compounds (VOCs)	2.37	10.42
Hazardous Air Pollutants (HAPs)	1.49	6.52

¹ A year is defined as any 12 consecutive month period.

- l. The Paint Plant RTO shall be equipped with instrumentation that continuously monitors the thermal oxidizer combustion chamber temperature to within 0.75% of the temperature measured, and records to the nearest 1 °F. The permittee shall at all times properly maintain and calibrate the continuous temperature monitor and recorder in accordance with manufacturer's specifications and good engineering practices. [§2103.12.a.2.B; IP #0057-I003, VI.1.c; IP #0057-I005c, V.A.1.f]
- m. The Paint Plant RTO shall meet the requirements of 40 CFR Part 63, Subpart SS, §63.982(c)(2), as specified in 40 CFR Part 63, Subpart HHHHH. [§2103.12.a; §2104.08; §63.8000(c)(1); §63.8005(a)(2)]
- n. The permittee shall at no time, conduct or allow to be conducted, charging of solid materials into the Environ processes and Large Batch Cells processes unless the Environ Baghouse and Ohio Blowpipe collection and control system are properly maintained and operated at all times, according to the following conditions: [§2103.12.a.2.B; IP #0057-I003, VI.1.d]
 - 1) All particulate emissions from the charging of solid materials into the Environ processes shall be vented through the Environ Baghouse and all particulate emissions from the charging of the Large Batch Cells processes shall be vented through the Ohio Blowpipe dust collection and control system. Each baghouse shall be equipped with automatic cleaning controls and instrumentation that shall continuously measure the differential pressure drop across the baghouse to within 2.0% of the measuring span of the device.
 - 2) The differential pressure drop across the baghouse shall not exceed a maximum of 6.0" w.c. of water column and a minimum of 1.0" w.c. at any time except during cleaning cycles.
- o. Emissions from the Environ Baghouse shall not exceed the limits in Table V-A-2 at any time:

[§2103.12.a.2.B; IP #0057-I003, VI.1.h]

Table V-A-2: Controlled Emission Limits

Pollutant	Hourly Emissions (lb/hr)	Yearly Emissions (tons/yr)¹
Particulate Matter	0.62	2.72
Particulate Matter < 10 µm (PM ₁₀)	0.62	2.72
Hazardous Air Pollutants (particulates)	0.25	1.10

¹ A year is defined as any 12 consecutive month period.

- p. Emissions from the Ohio Blowpipe Baghouse shall not exceed the limits in Table V-A-3 at any time: [§2103.12.a.2.B; IP #0057-I003, VI.1.j]

Table V-A-3: Controlled Emission Limits

Pollutant	Hourly Emissions (lb/hr)	Yearly Emissions (tons/yr)¹
Particulate Matter	0.73	3.20
Particulate Matter < 10 µm (PM ₁₀)	0.73	3.20

¹ A year is defined as any 12 consecutive month period.

- q. The permittee shall determine whether wastewater from the emission unit is Group 1 or Group 2 wastewater according to 40 CFR §63.8020. Group 1 wastewater streams shall be conveyed using hard-piping and shall be treated as a hazardous waste in accordance with 40 CFR part 264, 265, or 266 either onsite or offsite. Alternatively, if the wastewater contains <50 ppmw of partially soluble HAP, the permittee may elect to treat the wastewater in an enhanced biological treatment system that is located either onsite or offsite. [§2103.12.a; §2104.08; §63.8020(a); §63.8105; 40CFR Part 63 Subpart HHHHH Table 4, 2.a-b]
- r. To maintain Group 2 transfer rack status, the permittee shall not allow bulk loading of coating products that contain greater than or equal to 3.0 million gallons per year of HAP with a weighted average HAP partial pressure greater than or equal to 1.5 psia. If the permittee exceeds these requirements, the permittee shall control the transfer rack to the RTO and complete appropriate permit modification applications. [§2103.12.b.; §2104.08.a; §63.8015]
- s. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the conditions of this permit. The SSMP shall meet the requirements of 63 Subpart A, §63.6(e)(3). [§2103.12.a; §2104.08; §63.6(e)(3)]
- 1) During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain such source (including associated air pollution control equipment) in accordance with the procedures specified in the SSMP.
 - 2) When actions taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSMP, the permittee shall keep records for that event that demonstrate that the procedures specified in the plan were followed. In addition, the permittee shall keep records of these events as specified in condition V.A.4.f below, including records of the occurrence and duration of

each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control equipment.

- 3) If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the SSMP, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event.
 - 4) The permittee shall keep the written SSMP on record to be made available for inspection, upon request, by the Department for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the SSMP is revised, the permittee shall keep previous versions of the SSMP on record, to be made available for inspection, upon request, by the Department, for a period of 5 years after each revision to the plan.
- t. Opening of a safety device, as defined in §63.8105, is allowed at any time conditions require it to avoid unsafe conditions. [§2103.12.a; §2104.08; §63.8000(b)(2)]

2. Testing Requirements:

- a. The permittee shall conduct VOC and HAP emissions testing on the inlet and the outlet of the Paint Plant RTO to demonstrate compliance with condition V.A.1.e above. Such testing shall be conducted in accordance with US EPA approved test methods and §2108.02 of Article XXI. The testing shall be performed after initial start-up and once every five (5) years after the most recent stack test. [§2103.12.h.1; §63.982(c)(2); IP #0057-I005c, V.A.2.a; 25 Pa. Code §129.100]
- b. The permittee shall conduct tests to measure emissions using the following methods: [§2103.12.h; §2104.08; §63.8000(d)(1); §63.997(e)(2)(i)-(iv)]
 - 1) Conduct gas molecular weight analysis using Method 3, 3A, or 3B in appendix A to 40 CFR Part 60.
 - 2) Measure moisture content of the stack gas using Method 4 in appendix A to 40 CFR Part 60.
 - 3) The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, appendix A, as appropriate.
 - 4) TOC concentration shall be determined using Method 18 or 25/25A of 40 CFR Part 60, appendix A, as applicable.
 - 5) As an alternative to using Method 18, Method 25/25A, or Method 26/26A of 40 CFR Part 60, appendix A, the permittee may use Method 320 of 40 CFR part 60, appendix A. When using Method 320, the permittee shall follow the analyte spiking procedures of section 13 of Method 320, unless the permittee demonstrates that the complete spiking procedure has been conducted at a similar source.
- c. Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for at least 1 hour and under the conditions specified in condition V.A.2.e below. For the purpose of determining compliance, the arithmetic means of results of the three runs shall apply. [§2103.12.h; §2104.08; §63.997(e)(1)(v)]
- d. The permittee shall determine the minimum operating temperature as required under condition V.A.1.f from the most recent valid stack test that demonstrates compliance with the requirements in condition V.A.1.e above, as approved by the Department. On and after the date the approved stack test results are available, the permittee shall operate the Paint Plant RTO at or above the average temperature as observed during the compliant stack test. [§2103.12.h.1; §63.8005(e); §63.998(a)(2)(ii)(B)(1); IP#0057-I005c, V.A.2.b; 25 Pa. Code §129.100]

- e. The permittee shall conduct all tests while operating the Paint Plant at maximum routine operating conditions. Documentation of the Paint Plant operating conditions shall be included in the stack test report. Such documentation shall include but not be limited to: [§2108.02.e.2.A; §63.8005(d)(1); IP#0057-I005c, V.A.2.c]
 - 1) A listing of all vessels and equipment in use and connected to the RTO during the stack test.
 - 2) A listing of the production of each vessel in use and connected to the RTO during the stack test.
 - 3) Total material in process during the stack test.
 - 4) Tank cleaning that occurs during the stack test, including type and amount of solvent used.
- f. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. [§2103.12.h.1; §63.997(c)(2)]

3. Monitoring Requirements:

- a. The permittee shall externally inspect the Paint Plant RTO and associated ductwork weekly for proper operation as well as for integrity of the thermal oxidizer, process equipment, and gaseous collection systems. [§2103.12.i; §63.8000(c)(1); IP #0057-I005c, V.A.3.a]
- b. The permittee shall continuously monitor and record the Paint Plant RTO combustion chamber to the nearest 1°F of actual temperature at all times while treating process emissions. [§2102.04.b.6; §2103.12.i; §63.996(c); IP #0057-I003, VI.3.b; IP #0057-I005c, V.A.3.b; 25 Pa. Code §129.100]
- c. If the permittee chooses to demonstrate compliance with the outlet concentration standard in condition V.A.1.d.2) above, then the permittee shall install and properly operate and maintain a continuous monitoring system (CMS) to measure and record the amount of VOC (in ppm by volume, dry basis) exiting the Paint Plant RTO stack. [§2103.12.i; IP #0057-I005c, V.A.3.c; §63.998(2)(ii)(B)(4)]
- d. The permittee shall inspect the Environ Baghouse and Ohio Blowpipe collection and control system weekly to ensure compliance with conditions V.A.1.a and V.A.1.n through p. [§2103.12.i; IP #0057-I003, VI.3.a]
- e. The permittee shall perform monthly Leak Detection and Repair (LDAR) in accordance with condition V.B.3.a. [§2103.12.i; §2104.08; §63.8015(a); 63 Subpart HHHHH Table 3.1.a; §63.424(a)-(d)]

4. Record Keeping Requirements:

- a. The permittee shall record the monthly usage of all raw materials necessary to demonstrate compliance with this permit. Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements of this permit are met. Such records shall include, but not be limited to the following: [§2103.12.j; IP #0057-I003, VI.4.a; RACT Order #254, 1.22]
 - 1) Records of specific solvents and quantities used;
 - 2) Records of paint production rates by number of batches and quantity of paint produced in each batch.
- b. The permittee shall record the results of the inspection required by condition V.A.3.d above and

- the differential pressure drop across the Environ Baghouse and Ohio Blowpipe collection and control system weekly. [§2103.12.j; IP #0057-I003, VI.4.b]
- c. The temperature in the combustion chamber of the Paint Plant RTO shall be continuously recorded, at all times, while processing emissions from the Paint Plant. [§2103.12.j; §2104.08; §63.8000(d)(5); §63.998(b)(1)-(3), & (6); IP #0057-I003, VI.4.c; IP #0057-I005c, V.A.4.a; 25 Pa. Code §129.100]
- d. The permittee shall maintain the following records for the thermal oxidizer unit: [§2103.12.j; IP #0057-I005c, V.A.4.b]
- 1) Hours of operation;
 - 2) All data required to demonstrate compliance with the minimum temperature requirements of condition V.A.1.f above;
 - 3) All data recorded under condition V.A.4.c above; and
 - 4) Records of operation, maintenance, inspection, calibration, and/or replacement of combustion equipment.
- e. For the Paint Plant RTO temperature monitoring system, the permittee shall keep and maintain the calibration records outlined in 40 CFR Part 63, Subpart SS, §63.998(c). [§2103.12.j; §2104.08; §63.8000(c); §63.8000(d)(5); §63.8080(a)]
- f. The permittee shall maintain the following information for each startup, shutdown, or malfunction: [§2103.12.j; §2104.08; §63.10(b)(2)(i)-(v)]
- 1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - 2) The occurrence and duration of each malfunction of the air pollution control equipment;
 - 3) All maintenance performed on the air pollution control equipment;
 - 4) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSMP required under condition V.A.1.s above; and
 - 5) All information necessary to demonstrate conformance with the SSMP required under condition V.A.1.s above when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan.
- g. The permittee shall keep and maintain records of each time a safety device is opened to avoid unsafe conditions. [§2103.12.j; §2104.08; §63.8000(b)(2); §63.8080(c)]
- h. The permittee shall maintain all manufacturer specification and recommendations required to demonstrate compliance with condition V.A.1.d on file. These files shall be made available to the Department upon request. [§2103.12.j]
- i. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. [§2103.12.j; §63.998(d)(5); IP #0057-I003, VI.4.b; IP #0057-I005c, V.A.4.c]

- j. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; RACT Order #254, 1.23]

5. Reporting Requirements:

- a. The permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin. [§2103.12.k; §2104.08; §63.8070(c); §63.999(a)(1)]
- b. The permittee shall report the following information to the Department semiannually in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report, and shall include but not be limited to all of the information required under §63.999(c) and the information below: [§2103.12.k.1; §2104.08; 63 Subpart HHHHH Table 9.3 & Table 3.1; §63.8075(b); §63.8075(e)(1)-(6); §63.999(c); IP #0057-I003, VI.5.a; IP #0057-I005c, V.A.5.a]
- 1) Company name and address.
 - 2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) Monthly minimum temperatures, minimum temperature for the reporting period, and daily average temperatures for any days when the temperature was below the minimum in condition V.A.1.f.
 - 5) For each startup, shutdown, or malfunction (SSM) during which excess emissions occur, the compliance report shall include the following information:
 - a) Records that the procedures specified in the startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP.
 - b) A description of each malfunction.
 - 6) Non-compliance information required to be recorded by condition V.A.4.h above; and
 - 7) A certified statement signed by the responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
- c. The semiannual compliance report must also contain the following information for any deviations: [§2103.12.i; §2104.08; §63.8075(e)(6); 63 Subpart HHHHH Table 9.3 & Table 3.1]
- 1) If there are no deviations from any emission limit, operating limit, or work practice standard, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.
 - 2) For each deviation from an emission limit or operating limit, the permittee shall include the following information. This includes periods of startup, shutdown, and malfunction (SSM).
 - a) The date and time that each continuous monitoring system (CMS) was inoperative, except for zero (low-level) and high-level checks.
 - b) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
 - c) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
 - d) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
 - e) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total source operating time during that

- reporting period.
- f) An identification of each HAP that is known to be in the emission stream or wastewater stream, as applicable.
 - g) A description of the product being produced.
 - h) Identification of the CMS.
 - i) The date of the latest CMS certification or audit.
 - j) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred.
- d. The permittee shall notify the Department at least ten (10) days prior to the use of a new hazardous air pollutant in the Environ Work Center that will exceed 500 pounds consumption during any one month period. [§2103.12.k; IP #0057-I003, VI.5.c]
- e. If the permittee makes any changes to the proposed process, the following notifications must be submitted: [§2103.12.k; §2104.08; §63.8075(e)(8); 63 Subpart HHHHH Table 3.1]
- 1) Except as specified in paragraph condition V.A.5.e.2) below, whenever the permittee changes any of the information submitted in either the notification of compliance status report or any previously reported change to the notification of compliance status report, the permittee shall document the change in the compliance report. The notification shall include revisions to any of the information reported in the original notification of compliance status report.
 - 2) The permittee shall submit a report 60 days before the scheduled implementation date of any of the following changes:
 - a) Any change to the information contained in either the precompliance report or any previously reported change to the precompliance report.
 - b) A change in the status of a control device from small to large.
 - c) A change in compliance status.
- f. Reporting instances of non-compliance and malfunction, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2102.04.b.4; §2108.01.c]

6. Work Practice Standard:

- a. The permittee shall be properly operate and maintain the Paint Plant in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit. [§2105.03; RACT Order #254, 1.19; 25 Pa. Code §129.99]
 - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
 - 2) Keep records of any maintenance; and
 - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Paint Plant and associated thermal oxidizer and baghouses shall be properly operated and maintained according to good engineering practices at all times, with the exception of activities to mitigate emergency conditions, including, but not limited to: [§2105.03; RACT Order #254, 1.19; §2105.03; 25 Pa. Code §129.99]
 - 1) Properly calibrate all instrumentation;
 - 2) Minimize solvent spills and clean up solvent spills as expeditiously as practicable;
 - 3) Store solvent wastes and all rags used for solvent clean-up in closed containers; and
 - 4) Cover all open solvent containers when not in use.

- c. The permittee shall keep all manufacturers' specifications and operation manuals on-site and available for Department inspection and copying for the life of the equipment. [§2103.12.j; 25 Pa. Code §129.99]

B. Process P002: Paint Plant (Uncontrolled Emissions)

Process Description: CP Cell, Light Cell, Dark Cell, and Environ Work Centers; Large Batch Center; Solvent Still, Small Order Department, and Tank Cleaning
Control Device: None

1. Restrictions:

- a. Uncontrolled emissions from the Paint Plant shall not exceed the limits in Table V-B-1 at any time: [§2103.12.a.2.B]

Table V-B-1: Uncontrolled Paint Plant Emission Limits

Pollutant	Short-term Emissions (lb/hr²)	Annual Emissions (tons/year¹)
VOC's	54.34	238.0
HAP's	26.92	117.9

¹ A year is defined as any 12 consecutive months.

² Based on a daily average.

- b. The permittee shall equip each portable process vessel with a cover or lid that must be in place at all times when the vessel contains a HAP, except for material additions and sampling. The covers shall be maintained in good condition, such that when in place, they maintain contact with their respective rims for at least 90% of the circumference of the rim. [§2103.12.a; §2104.08; §63.8005(a)(1); 63 Subpart HHHHH Table 1.1; IP #0057-I004, V.A.1.b; RACT Order #254, 1.15; §129.99]
- c. The permittee shall not operate or allow to be operated any dispensing or filling systems for solvent-borne coatings unless they are of closed design or minimize free-fall of liquids. [§2103.12.a; RACT Order #254, 1.16 & 1.17; §129.99]
- d. The permittee shall conduct all process equipment cleaning so as to minimize VOC emissions. [§2103.12.a; RACT Order #254, 1.20; §129.99]
- e. The permittee shall not conduct or allow to be conducted any floor cleaning operations unless they employ water-based cleaners. The use of solvents shall be limited to spot cleaning. [§2103.12.a; RACT Order #254, 1.21; §129.99]

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 entitled "Emissions Testing." [§2103.12.h.1]

3. Monitoring Requirements:

- a. Leak Detection and Repair [§2103.12.i; §2104.08; §63.8015(a); 63 Subpart HHHHH Table 3.1.a; §63.424(a)-(d); §129.99]

- 1) The permittee shall perform a monthly leak inspection of all equipment in organic HAP service, with the exception of equipment in service less than 300 hours per year, equipment in vacuum service, or equipment contacting non-process fluids, as per 40 CFR 63.8015(b)(4). For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment must be inspected when it is operating in organic HAP service.
- 2) A log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in organic HAP service at the facility.
- 3) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided below.
- 4) Delay of repair of leaking equipment will be allowed upon a demonstration to the Department that repair within 15 days is not feasible. The permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed.

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain, at a minimum, the following records: [§2103.12.j]
 - 1) The Absolute Material Utilization (AMU) value, or equivalent, and the plant-wide solvent use based on that value;
 - 2) The monthly amount of non-bulk solvent-based paint waste, and records of solvent content in that waste;
 - 3) The monthly amount of non-bulk aqueous paint waste, and records of solvent content in that waste;
 - 4) The monthly amount of bulk still sludge and bulk paint waste, and records of solvent content in that waste.
- b. The permittee shall record the following information in the log book required by condition V.B.3.a.2) for each leak that is detected: [§2103.12.j; §2104.08; §63.8000(a); 63 Subpart HHHHH Table 3.1.a; §63.428(e); §129.100]
 - 1) The equipment type and identification number;
 - 2) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
 - 3) The date the leak was detected and the date of each attempt to repair the leak;
 - 4) Repair methods applied in each attempt to repair the leak;
 - 5) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - 6) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - 7) The date of successful repair of the leak.
- c. The log book required by condition V.B.3.a.2) shall be maintained on site and shall be available for Department inspection at all times. [§2103.12.h.2.A-B; 2103.12.j.1-2]
- d. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; RACT Order #254, 1.23]

5. Reporting Requirements:

- a. If the annual production exceeds 15 MMgal/12-month period, the permittee shall submit the following information as part of the semiannual report required under General Condition III.15: [§2103.12.k.1]
 - 1) All information required under condition V.B.4.a above;
 - 2) A rolling 12-month total estimate of emissions to demonstrate compliance with condition V.B.1.a above.
- b. For the LDAR program required under condition V.B.3.a, the permittee shall report to the Department a description of the types, identification numbers, and locations of all equipment in organic HAP service as part of the initial notification. If the facility elects to implement an instrument program, the report shall contain a full description of the program. [§2103.12.k; §2104.08; §63.8000(a); 63 Subpart HHHHH Table 3.1.a; §63.428(f); §129.100]
- c. The permittee shall include in the semiannual report each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: [§2103.12.k; §2104.08; 63 Subpart HHHHH Table 9.3 & Table 3.1; §63.428(h)(4)]
 - 1) The date on which the leak was detected;
 - 2) The date of each attempt to repair the leak;
 - 3) The reasons for the delay of repair; and
 - 4) The date of successful repair.

6. Work Practice Standard:

- a. The permittee shall properly operate and maintain the Paint Plant in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit. [§2105.03; RACT Order #254, 1.19; §129.99]
 - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
 - 2) Keep records of any maintenance; and
 - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Paint Plant shall be properly operated and maintained according to good engineering practices at all times, with the exception of activities to mitigate emergency conditions, including, but not limited to: [§2105.03; RACT Order #254, 1.19; §2105.03; §129.99]
 - 1) Properly calibrate all instrumentation;
 - 2) Minimize solvent spills and clean up solvent spills as expeditiously as practicable;
 - 3) Store solvent wastes and all rags used for solvent clean-up in closed containers; and
 - 4) Cover all open solvent containers when not in use.
- c. The permittee shall keep all manufacturers' specifications and operation manuals on-site and available for Department inspection and copying for the life of the equipment. [§2103.12.j]

C. Process P003: Paint Plant – Freightliner Spray Booth

Process Description: Surface Coating and Clean-up Operations.
Facility ID: No. 2004-B1
Number of Units: One (1) spray booth
Raw Materials: Sample metal & plastic panels (uncoated); solid & metallic coatings; hardener; clear coat; cleaning solvent (50% acetone, 50% butyl acetate)
Control Device(s): Filters on the back of the spray booth; electrostatic spray guns (transfer efficiency: 25-45%); 90% collection on cleaning solution.

1. Restrictions:

- a. The permittee shall not use any cleaning material that contains organic HAPs. [§2103.12.a.2.D; Installation Permit #0057-I004, V.A.1.a]
- b. The surface coating process shall use electrostatic spray guns for coating applications at all times. These guns shall be maintained and operated according to manufacturer’s recommendations and good engineering practice. [§2105.03; IP #0057-I004, V.A.1.b; §129.97]
- c. The paint spray booth shall be equipped with properly installed and maintained overspray filters. The filters shall be operated at all times during which the spray booth is in operation. [§2103.12.a.2.D §2105.03; IP #0057-I004, V.A.1.c; §129.97]
- d. Emissions from the surface coating process and clean-up operations shall not exceed the following at any time: [§2103.12.a; IP #0057-I004, V.A.1.d; §129.97]

Table V-C-1: Uncontrolled Paint Plant Emission Limits

Pollutant	lbs/hr¹	tpy²
Volatile Organic Compounds	0.57	2.50
Hazardous Air Pollutants	0.057	0.25

¹ Average per 8-hour shift.

² A year is defined as any 12 consecutive months.

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. [§2103.12.h.1]

3. Monitoring Requirements:

The surface coating spray units and overspray filters shall be inspected weekly while in operation for compliance with conditions V.C.1.b and V.C.1.c. [§2103.12.i; #0057-I004, V.A.2]

4. Record Keeping Requirements:

- a. The permittee shall maintain daily records while in operation of the following: [§2103.12.j; #0057-

I004, V.A.4.a]

- 1) The following parameters for each coating, thinner, and other component as-supplied:
 - a) The coating, thinner, or component name and identification number;
 - b) The volume used;
 - c) The mix ratio;
 - d) The density or specific gravity; and
 - e) The weight percent of total volatiles, water, solids, and exempt solvents.
 - 2) The VOC and HAP content of each coating, thinner, and other components as-supplied; and
 - 3) The VOC and HAP content of each as-applied coating.
- b. The name and volume of each cleaning material and/or solvent used. [§2103.12.j; IP #0057-I004, V.A.4.b]
- c. The permittee shall maintain records of inspection and maintenance of the overspray filters required under condition V.C.3 above. [§2103.12.j; #0057-I004, V.A.4.c]
- d. The permittee shall maintain all manufacturer specifications and recommendations required to demonstrate compliance with condition V.C.1.b on file. These files shall be made available to the Department upon request. [§2103.12.j]
- e. All records shall be maintained by the permittee for a period of at least five (5) years following the date of such record. [§2103.12.j.2]

5. Reporting Requirements:

- a. The permittee shall submit semi-annual reports to the Department in accordance with General Condition III.15. [§2103.12.k]
- b. The semi-annual report shall include the following information: [§2103.12k; IP #0057-I004, V.A.5.b]
 - 1) Calendar dates covered in the reporting period;
 - 2) The as-applied coating with the maximum VOC content and the as-applied coating with the maximum HAP content for each month of the reporting period;
 - 3) The total volume of as-applied coating material used during each month of the reporting period;
 - 4) All records of solvents and/or cleaning materials obtained under condition V.C.4.b; and
 - 5) Reasons for any noncompliance with the emission standards.

6. Work Practice Standard:

- a. The permittee shall store all VOC-containing coatings, thinners, coating-related waste material, cleaning materials and used shot towels in closed containers. [§2103.12.a.2.D; §129.97]
- b. The permittee shall ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials. [§2103.12.a.2.D; §129.97]
- c. The permittee shall minimize all spills of VOC-containing coatings, thinners, coating-related waste materials and cleaning materials, cleaning up spills immediately. [§2103.12.a.2.D; §129.97]

- d. The permittee shall convey VOC-containing coatings, thinners, coating-related waste materials and cleaning materials from one location to another in closed containers or pipes. [§2103.12.a.2.D; §129.97]
- e. The permittee shall operate and maintain all process equipment according to manufacturers' specifications and recommendations, and good engineering practices. [§2103.12.a.2.D; §2105.03; §129.97]
- f. The permittee shall keep the manufacturer's operating manuals on site and available at all times. [§2103.12.a.2.D; §2105.03; §129.97]

D. Process P004: Development Center (Controlled Emissions)

Process Description:	K13/K15 Reactor System, Large Side Reactor System, LUWA Filmtruder, BS5000 Resin Stripper, and R2000 Reactor Process
Raw Materials:	Solvent, Epoxy, Catalyst, Monomers
Control Device:	Development Center Regenerative Thermal Oxidizer (RTO)
Capacity:	1.6 MMBtu/hr
Fuel:	Natural Gas

1. Restrictions:

- a. The permittee shall not operate the K13/K15 Reactor System, Large Side Reactor System, LUWA Filmtruder, BS5000 Resin Stripper, and R2000 Reactor Process at any time while generating VOC emissions unless the Development Center RTO is in service and operating as required. [§2103.12.a; IP #0057-I005c; V.B.1.a; IP #0057-I008, V.A.1.a]
- b. The Development Center RTO shall be properly operated and maintained according to good engineering practices (as proscribed in Monitoring Section V.D.3 below, manufacturer's recommendations, and the following conditions at all times while treating process emissions: [§2103.12.a; §2104.08; IP #0057-I001, V.1.b; IP #0057-I005c, V.B.1.b; IP #0057-I008, V.A.1.b; §63.2460(a); 40 CFR Part 63 Subpart FFFF Table 2.1.a & c;]
 - 1) The minimum VOC destruction efficiency shall be 98% by weight; or [§129.99]
 - 2) A VOC concentration less than 20 ppm by volume dry basis.
- c. The RTO shall be operated at a minimum operating temperature of 1,500 °F or the temperature at which the destruction efficiency in condition V.D.1.b.1) above is demonstrated during the most recent stack test, whichever is greater. [§2103.12.a; §2105.30.b; IP #0057-I001, V.1.b; IP #0057-I008, V.A.1.c; IP #0057-I005c, V.B.1.c]
- d. The permittee shall not operate, nor allow to be operated, the Development Center RTO using a fuel other than utility-grade natural gas. [§2103.12.a.2.B; IP #0057-I005c, V.B.1.e; IP #0057-I008, V.A.1.d]
- e. If the Development Center RTO is not in operation for a period of an hour or greater, the permittee shall vent all emissions from the K13/K15 Reactor System, Large Side Reactor System, LUWA Filmtruder, BS5000 Resin Stripper, and R2000 Reactor Process to the carbon bins within the second hour in which the RTO is offline. [§2103.12.a.2.B; IP #0057-I008, V.A.1.e]
- f. The permittee shall vent emissions from the Large Side Reactor System to the respective scrubbers any time those systems are processing batches with chemistry incompatible with the RTO (such as those containing ammonia). [§2103.12.a.2.B; IP #0057-I008, V.A.1.f]
- g. Emissions from the Development Center RTO shall not exceed the values in Table V-D-1 at any time: [§2103.12.a; IP #0057-I005c, V.B.1.e; IP #0057-I008, V.A.1.g]

TABLE V-D-1: Development Center RTO Emission Limitations

POLLUTANT	Hourly Emissions (lb/hr)	Yearly Emissions (tons/yr) ¹
Particulate Matter	0.013	0.056
Particulate Matter <10µm (PM ₁₀)	0.013	0.056
Particulate Matter <2.5µm (PM _{2.5})	0.013	0.056
Nitrogen Oxides (NO _x)	0.180	0.790
Sulfur Oxides (SO _x)	0.001	0.005
Carbon Monoxide (CO)	0.152	0.664
Volatile Organic Compounds (VOC's)	0.846	3.703
Hazardous Air Pollutants (HAP's)	0.846	3.703

¹ A year is defined as any 12 consecutive months.

- h. The Development Center RTO shall be equipped with instrumentation that continuously monitors the thermal oxidizer combustion chamber temperature to within 0.75% of the temperature measured, and records to the nearest 1°F. The permittee shall at all times properly maintain and calibrate the continuous temperature monitor and recorder in accordance with manufacturer's specifications and good engineering practices. [§2103.12.a; IP #0057-I005c, V.B.1.f; IP #0057-I008, V.A.1.h]
- i. The permittee shall not operate or allow to be operated any filling systems unless they are of closed design or minimize free-fall of liquids. [§2103.12.a.2.B; IP #0057-I008, V.A.1.i]
- j. The Development Center RTO shall meet the requirements of 40 CFR Part 63, Subpart SS, §63.982(c)(2), as specified in 40 CFR Part 63, Subpart FFFF. [IP #0057-I008, V.A.1.j ; §2103.12.a; §2104.08; §63.2450(e)(1)]
- k. The permittee shall determine the Group 1 or 2 status of storage tanks. To maintain Group 2 storage tank status, the permittee shall not store any materials with a maximum true vapor pressure of total HAP greater than or equal to 1.0 psia in any storage tank with a capacity greater than or equal to 10,000 gallons. If the storage tank changes to Group 1 status, the permittee shall connect the tank to control and complete appropriate permit modification applications. [§2103.12.a; §2104.08; §63.2470(a)]
- l. The permittee shall determine the Group 1 or 2 status of transfer racks. To maintain Group 2 transfer rack status, the permittee shall not allow bulk loading of any materials that contain greater than or equal to 0.17 million gallons per year of liquids that contain organic HAP with a rack-weighted partial pressure, as defined in §63.111, greater than or equal to 1.5 psia. If the transfer rack changes to Group 1 status, the permittee shall connect the rack to control and complete appropriate permit modification applications. [§2103.12.a; §2104.08; §63.2475(a)]
- m. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the conditions of

this permit. The SSMP shall meet the requirements of 63 Subpart A, §63.6(e)(3). [§2103.12.a; §2104.08; §63.6(e)(3)]

- 1) During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain such source (including associated air pollution control equipment) in accordance with the procedures specified in the SSMP.
 - 2) When actions taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSMP, the permittee shall keep records for that event that demonstrate that the procedures specified in the plan were followed. In addition, the permittee shall keep records of these events as specified in condition V.D.4.h below, including records of the occurrence and duration of each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control equipment.
 - 3) If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the SSMP, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event.
 - 4) The permittee shall keep the written SSMP on record to be made available for inspection, upon request, by the Department for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the SSMP is revised, the permittee shall keep previous versions of the SSMP on record, to be made available for inspection, upon request, by the Department, for a period of 5 years after each revision to the plan.
- n. Opening of a safety device, as defined in §63.8105, is allowed at any time conditions require it to avoid unsafe conditions. [§2103.12.a; §2104.08; §63.2450(p) ; IP #0057-I008, V.A.1.k]
- o. The permittee shall meet the requirements of Section V.G for all process and maintenance wastewater from the equipment in the Development Center. [§2103.12.a; §2104.08; §63.2485(a)]

2. Testing Requirements:

- a. The permittee shall conduct VOC and HAP emissions testing on the inlet and the outlet of the Development Center RTO to demonstrate compliance with the requirements in condition V.D.1.b.1) above and limits in condition V.D.1.g above. Such testing shall be conducted in accordance with US EPA approved test methods and §2108.02 of Article XXI. The testing shall be performed after initial start-up and once every five (5) years thereafter. [§2103.12.h.1; IP #0057-I001, V.2.a; IP #0057-I005c, V.B.2.a; IP #0057-I008, V.A.2.a; §129.100]
- b. The permittee shall determine the minimum operating temperature as required under condition V.D.1.c from the most recent valid stack test that demonstrates compliance with limits in condition V.D.1.g above, as approved by the Department. On and after the date the approved stack test results are available, the permittee shall operate the thermal oxidizer at or above the average temperature as observed during the compliant stack test. [§2103.12.h.1; IP #0057-I005c, V.B.2.b; IP #0057-I008, V.A.2.b; §129.100]
- c. The permittee shall conduct all tests while operating the Development Center at maximum routine operating conditions. Documentation of the Development Center operating conditions shall be included in the stack test report. Such documentation shall include but not be limited to: [§2108.02e.2.A; IP #0057-I005c, V.B.2.c]
 - 1) A listing of all vessels and equipment in use and connected to the RTO during the stack test.

- 2) A listing of the material in each vessel in use and connected to the RTO during the stack test.
- d. The permittee shall conduct tests to measure emissions using the following methods unless other methods are approved by the Department: [§2103.12.h; §2104.08; §63.2450(g); §63.997(e)(2)(i)-(iv) ; IP #0057-I008, V.A.2.d]
- 1) Conduct gas molecular weight analysis using Method 3, 3A, or 3B in appendix A to 40 CFR Part 60.
 - 2) Measure moisture content of the stack gas using Method 4 in appendix A to 40 CFR Part 60.
 - 3) The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, appendix A, as appropriate.
 - 4) TOC concentration shall be determined using Method 18 or 25/25A of 40 CFR Part 60, appendix A, as applicable.
 - 5) As an alternative to using Method 18, Method 25/25A, or Method 26/26A of 40 CFR Part 60, appendix A, the permittee may use Method 320 of 40 CFR part 60, appendix A. When using Method 320, the permittee shall follow the analyte spiking procedures of section 13 of Method 320, unless the permittee demonstrates that the complete spiking procedure has been conducted at a similar source.
- e. If the permittee adds supplemental combustion air and is required to correct the measured concentration at the outlet of the RTO to 3 percent oxygen, the permittee shall use Equation 1 of §63.2460. [§2103.12.h; §2104.08; §63.2450(i) ; IP #0057-I008, V.A.2.e]
- f. Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for at least 1 hour and under the conditions specified in condition V.D.2.c above. For the purpose of determining compliance, the arithmetic means of results of the three runs shall apply. [§2103.12.h; §2104.08; §63.997(e)(1)(v); IP #0057-I008, V.A.2.f]
- g. If the permittee elects to demonstrate compliance with the outlet concentration limit in condition V.D.1.b.2) above by using a CEM, the testing methods in §63.2450(j) shall be followed. [§2103.12.h; §2104.08; §63.2450(j) ; IP #0057-I008, V.A.2.g]
- h. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Testing shall be performed in accordance with Site Level Condition IV.13 entitled “Emissions Testing.” [§2103.12.h.1; IP #0057-I008, V.A.2.h]

3. Monitoring Requirements:

- a. The permittee shall externally inspect the Development Center RTO and associated ductwork weekly for proper operation as well as for integrity of the thermal oxidizer, process equipment, and gaseous collection systems. [§2103.12.i; IP #0057-I001, V.3.a; IP #0057-I005c, V.B.3.a; IP #0057-I008, V.A.3.a]
- b. The permittee shall continuously monitor and record the Development Center RTO combustion chamber to the nearest 1°F of actual conditions at all times while treating process emissions. [§2103.12.i; IP #0057-I005c, V.B.3.b; IP #0057-I008, V.A.3.b; §129.100]
- c. If the permittee chooses to demonstrate compliance with the outlet concentration standard in condition V.D.1.b.2) above, then the permittee shall install and properly operate and maintain a continuous monitoring system (CMS) to measure and record the amount of VOC (in ppm by

volume, dry basis) exiting the Development Center RTO stack. [§2103.12.i; IP #0057-I005c, V.B.3.c; IP #0057-I008, V.A.3.c]

4. Record Keeping Requirements:

- a. The temperature in the combustion chamber of the Development Center RTO shall be continuously recorded, at all times, while processing emissions from the Development Center. [§2103.12.j; §2104.08; §63.2450(e); §63.998(b)(1)-(3); IP #0057-I005c, V.B.4.a; IP #0057-I008, V.A.4.a; §129.100]
- b. The permittee shall maintain the following records for the thermal oxidizer unit: [§2103.12.j; IP #0057-I005c, V.B.4.b; IP #0057-I008, V.A.4.b]
 - 1) Hours of operation;
 - 2) All data required to demonstrate compliance with the minimum temperature requirements of condition V.D.1.c above;
 - 3) All data recorded under condition V.D.4.a above; and
 - 4) Records of operation, maintenance, inspection, calibration, and/or replacement of combustion equipment.
- c. The permittee shall record the raw material usage and the type and amount of resin produced per batch, as well as results of the inspections required by condition V.D.3.a above along with any episodes of non-compliance with conditions V.D.1.a through c above and corrective actions taken. [§2103.12.j; IP #0057-I001, V.B.4.c; IP #0057-I008, V.A.4.c]
- d. For the Development Center RTO temperature monitoring system, the permittee shall keep and maintain the calibration records outlined in 40 CFR Part 63, Subpart SS, §63.998(c). [§2103.12.j; §2104.08; §63.2450(e); §63.2450(k); §63.2525(g); IP #0057-I008, V.A.4.d]
- e. The permittee shall keep and maintain records of each time a safety device is opened to avoid unsafe conditions in accordance with condition V.D.1.n. [§63.2525(f); IP #0057-I008, V.A.4.e]
- f. The permittee shall keep records of the Development Center RTO destruction efficiency tests to demonstrate compliance with the requirements of section V.D.1 above. Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements have been met. [§2103.12.j; IP #0057-I005c, V.B.4.c; IP #0057-I008, V.A.4.f]
- g. The permittee shall keep each applicable record required by 40 CFR Part 63, Subpart A and in referenced Subparts F, G, SS, and UU. [§2103.12.j; §2104.08; §63.2525(a); IP #0057-I008, V.A.4.g]
- h. The permittee shall maintain the following information for each startup, shutdown, or malfunction: [§2103.12.j; §2104.08; §63.10(b)(2)(i)-(v); IP #0057-I008, V.A.4.h]
 - 1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - 2) The occurrence and duration of each malfunction of the air pollution control equipment;
 - 3) All maintenance performed on the air pollution control equipment;
 - 4) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSMP required under condition V.D.1.m above; and

- 5) All information necessary to demonstrate conformance with the SSMP required under condition V.D.1.m above when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan.
- i. The permittee shall maintain all manufacturer specifications and recommendations required to demonstrate compliance with condition V.D.1.b on file. These files shall be made available to the Department upon request. [§2103.12.j; IP #0057-I008, V.A.4.i]
- j. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. [§2103.12.j; IP #0057-I005c, V.B.4.d; IP #0057-I008, V.A.4.j]
- k. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; IP #0057-I008, V.A.4.k]

5. Reporting Requirements:

- a. The permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin. The permittee shall also submit the test plan required by §63.7(c) and the emission profile with the notification of the performance test. [§2103.12.k; §2104.08; §63.2515(c); IP #0057-I008, V.A.5.a]
- b. The permittee shall submit a compliance report to the Department semiannually in accordance with General Condition III.15. The compliance report must contain the following information: [§2103.12.k; §2104.08; §63.2450(a); §63.2520(a); Subpart FFFF Table 11.3; §63.2520(e); IP #0057-I008, V.A.5.b]
- 1) Company name and address.
 - 2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) For each startup, shutdown, or malfunction (SSM) during which excess emissions occur, the compliance report must include records that the procedures specified in the startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.
 - 5) The compliance report must contain the following information on deviations:
 - a) If there are no deviations from any condition in this permit, include a statement that there were no deviations during the reporting period.
 - b) For each deviation from an emission limit or operating limit, the permittee shall include the following information. This includes periods of SSM.
 - i) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
 - ii) The date, time, and duration that each CEMS was out-of-control, including start and end dates and hours and descriptions of corrective actions taken.
 - iii) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
 - iv) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total operating time of the affected source during that

- reporting period.
- v) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
 - vi) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the affected source during that reporting period.
 - vii) An identification of each HAP that is known to be in the emission stream.
 - viii) A brief description of the process units.
 - ix) A brief description of the CMS.
 - x) The date of the latest CMS certification or audit.
 - xi) Operating logs of processes with batch vents from batch operations for each day(s) during which the deviation occurred.
 - xii) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred.
- 6) Applicable records and information for periodic reports as specified in referenced Subparts F, G, H, SS, and UU.
- 7) Notification of process change.
- a) Except as specified in condition V.D.5.b.7)b) below, whenever the permittee makes a process change, or change any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, the permittee shall document the change in the compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the information below:
 - i) A description of the process change.
 - ii) Revisions to any of the information reported in the original notification of compliance status report.
 - iii) Information required by the notification of compliance status report for changes involving the addition of processes or equipment.
 - b) The permittee shall submit a report 60 days before the scheduled implementation date of any change to the information contained in the precompliance report.
- c. The permittee shall report the following information to the Department semiannually in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report: [§2103.12.k.1; IP #0057-I001, V.5.a; IP #0057-I005c, V.B.5.a; IP #0057-I008, V.A.5.c]
- 1) Company name and address.
 - 2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) Monthly minimum temperatures, minimum temperature for the reporting period, and daily average temperatures for any days when the temperature was below the minimum in condition V.D.1.c.
 - 5) For each startup, shutdown, or malfunction (SSM) during which excess emissions occur, the compliance report shall include the following information:
 - a) Records that the procedures specified in the startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP.
 - b) A description of each malfunction.

- 6) Non-compliance information required to be recorded by conditions V.D.4.c and V.D.4.i above; and
 - 7) A certified statement signed by the responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
 - 8) Dates of any cold starts of the Development Center RTO.
- d. Reporting instances of non-compliance in accordance with condition V.D.5.c.1) above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1; IP #0057-I005c, V.B.5.b; IP #0057-I008, V.A.5.d]

6. Work Practice Standard:

- a. The permittee shall properly operate and maintain the Development Center in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit. [§2105.03; RACT Order #254, 1.19; IP #0057-I008, V.A.6; §129.99]
 - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
 - 2) Keep records of any maintenance; and
 - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Development Center and associated thermal oxidizer shall be properly operated and maintained according to good engineering practices at all times, with the exception of activities to mitigate emergency conditions, including, but not limited to: [§2105.03; RACT Order #254, 1.19; §2105.03; IP #0057-I008, V.A.6; §129.99]
 - 1) Properly calibrate all instrumentation;
 - 2) Minimize solvent spills and clean up solvent spills as expeditiously as practicable;
 - 3) Store solvent wastes and all rags used for solvent clean-up in closed containers; and
 - 4) Cover all open solvent containers when not in use.
- c. The permittee shall keep all manufacturers' specifications and operation manuals on-site and available for Department inspection and copying for the life of the equipment. [§2103.12.j; §129.99]

E. Process P005: Development Center (Uncontrolled Emissions)

Process Description:

Fugitive emissions from the K13/K15 Reactor System, Large Side Reactor System, LUWA Filmtruder, BS5000 Resin Stripper, R2000 Reactor Process, and the Small Side Reactor System.

Control Device:

None

1. Restrictions:

- a. The permittee shall comply with the requirements 40 CFR Part 63, Subpart UU – National Emission Standards for Equipment Leaks – Control Level 2 for equipment leaks in all equipment in organic HAP service, except as specified in §63.2480(b). If the permittee elects to use a different compliance option in Table 6.1 of Subpart FFFF, the permittee shall notify the Department no later than 30 days prior to the change. [§2103.12.a; §2104.08; §63.2450(a); §63.2480(a); 63 Subpart FFFF Table 6.1.a; IP #0057-I008, V.B.1.a; §129.99]
- b. The permittee shall vent all emissions from the Small Side Reactors through a condenser at all times the reactor is processing material. [§2103.12.a.2]
- c. Emissions from the Small Side Reactor System shall not exceed the limits in Table V-E-1 at any time: [§2103.12.a.2.B; 25 Pa. Code §129.96(c)]

Table V-E-1: Small Side Reactor System Emission Limits

Pollutant	Short-term Emissions (lb/hr)	Annual Emissions (tons/year¹)
VOC's	0.16	0.70
HAP's	0.08	0.35

¹ A year is defined as any 12 consecutive months.

- d. The permittee shall identify all equipment subject to Leak Detection and Repair (LDAR) in accordance with §63.1022 of Subpart UU. [§2103.12.a; §2104.08; §63.2480(a); §63.1022(a) ; IP #0057-I008, V.B.1.b; §129.99]
- e. The permittee shall meet the requirements of Section V.G for all process and maintenance wastewater from the equipment in the Development Center. [§2103.12.a; §2104.08; §63.2485(a)]

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 entitled “Emissions Testing.” [§2103.12.h.1]

3. Monitoring Requirements:

- a. The permittee shall monitor regulated equipment as specified in condition V.E.1.a above. [§2103.12.i; §2104.08; §63.2480(a); IP #0057-I008, V.A.3.a]

- b. *Leaking equipment identification and records.* [§2103.12.i; §2104.08; §63.2480(a); §63.1023(e); IP #0057-I008, V.A.3.b; §129.99]
- 1) When each leak is detected pursuant to the monitoring specified in §63.1023(a) in accordance with condition V.E.3.a above, a weatherproof and readily visible identification, shall be attached to the leaking equipment.
 - 2) When each leak is detected, the permittee shall record the information specified in V.E.4.b below.
- c. The permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected, except as provided in §§63.1024(d) and (e). A first attempt at repair as defined in this subpart shall be made no later than 5 calendar days after the leak is detected. [§2103.12.i; §2104.08; §63.2480(a); §63.1024(a); IP #0057-I008, V.A.3.c; §129.99]

4. Record Keeping Requirements:

- a. The permittee shall keep each applicable record required by 40 CFR Part 63, Subpart A and in referenced Subparts F, G, SS, and UU. [§2103.12.j; §2104.08; §63.2525(a); IP #0057-I008, V.A.4.a; §129.100]
- b. For each leak detected, the following information shall be recorded: [§63.2480(a); §63.1024(f); IP #0057-I008, V.A.4.b; §129.100]
- 1) The date of first attempt to repair the leak.
 - 2) The date of successful repair of the leak.
 - 3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonreparable.
 - 4) “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak as specified in conditions a) and b) below:
 - a) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup, shutdown, and malfunction plan, as required by condition V.D.1.m, or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
 - b) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
 - 5) Dates of shutdowns that occur while the equipment is unrepaired.
- c. The permittee shall keep records of the number and types of components subject to LDAR, as required under condition V.E.1.d above. [§2103.12.j; §2104.08; §63.2480(a); §63.1022; IP #0057-I008, V.A.4.c; §129.100]
- d. The permittee shall keep specific equipment leak records according to §63.1038 of Subpart UU. [§2103.12.j; §2104.08; §63.2480(a); §63.1038(c); IP #0057-I008, V.A.4.d; §129.100]
- e. For the Small Side Reactor System, the permittee shall record the raw material usage and the type and amount of resin produced per batch. [§2103.12.j; IP #0057-I008, V.A.4.e]
- f. The permittee shall maintain records of each startup, shutdown, or malfunction in accordance with condition V.D.4.h. [§2103.12.j; §2104.08; §63.10(b)(2)(i)-(v); IP #0057-I008, V.A.4.f]

- g. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. [§2103.12.j; IP #0057-I008, V.A.4.g]
- h. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; IP #0057-I008, V.A.4.h]

5. Reporting Requirements:

- a. The permittee shall report the monthly amount of resin produced in the Small Side Reactor System upon request by the Department. [§2103.12.k.1]
- b. The permittee shall report the following LDAR information in the semiannual report required under General Condition III.15 above: [§2103.12.k; §2104.08; §63.2480(a); §63.1039(b); IP #0057-I008, V.A.5.a); §129.100]
 - 1) For the following equipment, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers, and the total number of components monitored. Also include the number of leaking components that were not repaired as required by condition V.E.3.c above, and for valves and connectors, identify the number of components that are determined to be nonreparable.
 - a) Valves in gas and vapor service and in light liquid service pursuant to §63.1025(b) and (c) of Subpart UU.
 - b) Pumps in light liquid service pursuant to §63.1026(b) and (c) of Subpart UU.
 - c) Connectors in gas and vapor service and in light liquid service pursuant to §63.1027(b) and (c) of Subpart UU.
 - d) Agitators in gas and vapor service and in light liquid service pursuant to §63.1028(c) of Subpart UU.
 - e) Compressors pursuant to §63.1031(d) of Subpart UU.
 - 2) Where any delay of repair is utilized pursuant to condition V.E.3.c above, report that delay of repair has occurred and report the number of instances of delay of repair.
 - 3) If applicable, report the valve subgrouping information specified in §63.1025(b)(4)(iv).
 - 4) For pressure relief devices in gas and vapor service pursuant to §63.1030(b) and for compressors pursuant to §63.1031(f) that are to be operated at a leak detection instrument reading of less than 500 parts per million, report the results of all monitoring to show compliance conducted within the semiannual reporting period.
 - 5) Report, if applicable, the initiation of a monthly monitoring program for valves pursuant to §63.1025(b)(3)(i).
 - 6) Report, if applicable, the initiation of a quality improvement program for pumps pursuant to §63.1035.
 - 7) Where the alternative means of emissions limitation for batch processes is utilized, report the information listed in §63.1036(f).

6. Work Practice Standard:

- a. The permittee shall properly operate and maintain the Development Center in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit. [§2105.03; RACT Order #254, 1.19; §129.99]
 - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance

- procedures;
- 2) Keep records of any maintenance; and
 - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Development Center shall be properly operated and maintained according to good engineering practices at all times, with the exception of activities to mitigate emergency conditions, including, but not limited to: [§2105.03; RACT Order #254, 1.19; §2105.03; §129.99]
- 1) Properly calibrate all instrumentation;
 - 2) Minimize solvent spills and clean up solvent spills as expeditiously as practicable;
 - 3) Store solvent wastes and all rags used for solvent clean-up in closed containers; and
 - 4) Cover all open solvent containers when not in use.
- c. The permittee shall keep all manufacturers' specifications and operation manuals on-site and available for Department inspection and copying for the life of the equipment. [§2103.12.j; §129.99]
- d. The permittee shall equip each portable process vessel with a cover or lid that must be in place at all times when the vessel contains a HAP, except for material additions and sampling. The covers shall be maintained in good condition, such that when in place, they maintain contact with their respective rims for at least 90% of the circumference of the rim. [§2103.12.a; §2104.08; §63.8005(a)(1); V.A.1.b; §129.99]
- e. The permittee shall not operate or allow to be operated any dispensing or filling systems for solvents unless they are of closed design or minimize free-fall of liquids. [§2103.12.a; §129.99]
- f. The permittee shall conduct all process equipment cleaning so as to minimize VOC emissions. [§2103.12.a; §129.99]
- g. The permittee shall not conduct or allow to be conducted any floor cleaning operations unless they employ water-based cleaners. The use of solvents shall be limited to spot cleaning. [§2103.12.a; §129.99]

F. Process P006: Automated Paint Spray Booth

Process Description: Automated Paint Spray Booth with two 50,000 Btu/hr curing/drying ovens
Facility ID: P006
Capacity: 5,060 gallons of coatings per year
Raw Materials: coatings (pigment, resin, solvent); 12"×12" aluminum panels (substrates); natural gas (curing/drying ovens)
Control Device(s): none

1. Restrictions:

- a. Coating usage shall be limited to the following: [IP #0057-I009, V.A.1.a; §2103.12.a.2.D]
 - 1) For primer, 1.6 gallons per day (as a rolling 7-day average) and 560 gallons per 12-month period; and
 - 2) For topcoats, 12.1 gallons per day (as a rolling 7-day average) and 4,500 gallons per 12-month period.
- b. The VOC content, as applied, shall not at any time exceed 2.80 pounds per gallon for primer and 2.80 pounds per gallon for topcoats. [IP #0057-I009, V.A.1.b; §2103.12.a.2.D; §2105.83.g]
- c. The total HAP content, as applied, shall not at any time exceed 85.91% for primer and 71.56% for topcoat, as a percentage of VOC. [IP #0057-I009, V.A.1.c; §2103.12.a.2.D]
- d. The paint booth shall be equipped with properly installed and maintained overspray filters. The filters shall be operated at all times during which the spray booth is in operation. [IP #0057-I009, V.A.1.d; §2103.12.a.2.D; §2105.03; §129.99]
- e. All spray-applied coatings must be applied with an air-assisted rotary bell spray gun. [IP #0057-I009, V.A.1.e; §2103.12.a.2.D; §129.99]
- f. Emissions from the automated paint spray booth shall not exceed the following at any time [IP #0057-I009, V.A.1.f; §2103.12.a.2.D]:

Table V-F-1: Automated Paint Spray Booth Emission Limits

Pollutant	Emissions	
	lb/hr	tpy ¹
Volatile Organic Compounds (VOC)	2.12	6.96
Hazardous Air Pollutants (HAP)	1.54	5.09

¹ A year is defined as any 12 consecutive months.

- g. The permittee shall not use any cleaning solvents that contain VOC or HAP. [IP #0057-I009, V.A.1.g; §2103.12.a.2.D]

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 entitled "Emissions Testing". [IP #0057-I009, V.A.2; §2103.12.h.1]

3. Monitoring Requirements:

The permittee shall inspect the spray units and overspray filters weekly for compliance with conditions V.F.1.d and V.F.1.e above. [IP #0057-I009, V.A.3; §2103.12.a.2.D; §2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall maintain daily, monthly, and 12-month records of the following for each primer and topcoat as applied: [IP #0057-I009, V.A.4.a; §2105.83.c]
 - 1) The topcoat or primer name and identification number;
 - 2) The volume used;
 - 3) The density or specific gravity;
 - 4) The weight percent of total volatiles, water, solids, and exempt solvents; and
 - 5) The HAP content and the VOC content.
- b. The permittee shall maintain records of inspection and maintenance of the overspray filters required under condition V.F.3 above. [IP #0057-I009, V.A.4.b; §2103.12.a.2.D; §2103.12.j]
- c. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. [IP #0057-I009, V.A.4.c; §2103.12.a.2.D; §2103.12.j]
- d. All records shall be maintained by the permittee for a period of at least five (5) years following the date of such record. [IP #0057-I009, V.A.4.d; §2103.12.j.2]

5. Reporting Requirements:

- a. The permittee shall report the following information to the Department semiannually in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report: [IP #0057-I009, V.A.5.a; §2103.12.a.2.D; §2103.12.k]
 - 1) Company name and address;
 - 2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - 3) Calendar dates covered in the reporting period;
 - 4) Monthly totals of each primer or topcoat as required to be recorded under condition V.F.4.a above;
 - 5) The monthly maximum VOC content calculated in condition V.F.4.a.4) above;
 - 6) The monthly maximum HAP content calculated in condition V.F.4.a.5) above; and
 - 7) A monthly estimate of the emissions of VOCs and HAPs;
- b. Reporting instances of non-compliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [IP #0057-I009, V.A.5.b; §2103.12.a.2.D; §2103.12.k]

6. Work Practice Standard:

- a. The permittee shall store all VOC-containing coatings, thinners, coating-related waste material, cleaning materials and used shot towels in closed containers. [IP #0057-I009, V.A.6.a; §2103.12.a.2.D; §129.99]

- b. The permittee shall ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials. [IP #0057-I009, V.A.6.b; §2103.12.a.2.D; §129.99]
- c. The permittee shall minimize all spills of VOC-containing coatings, thinners, coating-related waste materials and cleaning materials, cleaning up spills immediately. [IP #0057-I009, V.A.6.c; §2103.12.a.2.D; §129.99]
- d. The permittee shall convey VOC-containing coatings, thinners, coating-related waste materials and cleaning materials from one location to another in closed containers or pipes. [IP #0057-I009, V.A.6.d; §2103.12.a.2.D; §129.99]
- e. The permittee shall operate and maintain all process equipment according to manufacturers' specifications and recommendations, and good engineering practices. [IP #0057-I009, V.A.6.e; §2103.12.a.2.D; §2105.03; §129.99]
- f. The permittee shall keep the manufacturer's operating manuals on site and available at all times. [IP #0057-I009, V.A.6.f; §2103.12.a.2.D; §2105.03; §129.99]

G. Process P004 & P005: Development Center – Wastewater Handling

The wastewater handling requirements apply to the process and maintenance wastewater generated from all Development Center sources listed in the Facility Description Table in Section II.

1. Restrictions:

- a. The permittee shall identify all process wastewater streams as either Group 1 or Group 2 wastewater according to 40 CFR §63.2485(c) and as designated in 40 CFR Part 63, Subpart G, §63.132(e). [§2103.12.a; §2104.08; §63.2485(c); Subpart FFFF Table 7.1; §63.144(a)(2)]
- b. The permittee shall treat all Group 1 process wastewater onsite in accordance with the requirements of 40 CFR Part 63, Subpart G, §§63.134 through §63.139 and the testing requirements of §63.145, or the permittee may elect to transfer process wastewater offsite for treatment. [§2103.12.a; §2104.08; §63.2485(a); Subpart FFFF Table 7.1]
- c. *Offsite management and treatment option.*
 - 1) If the permittee elects to ship Group 1 process wastewater to an offsite treatment facility that meets the requirements of §63.138(h), the permittee may elect to document in the notification of compliance status report that the wastewater will be treated as hazardous waste at a facility that meets the requirements of §63.138(h) as an alternative to having the offsite facility submit the certification specified in condition V.G.1.d.2) below. [§2103.12.a; §2104.08; §63.2485(i)]
 - 2) (2) As an alternative to the management and treatment options specified in condition V.G.1.d.2) below, any affected process wastewater stream (or residual removed from an affected process wastewater stream) with a total annual average concentration of compounds in Table 8 to Subpart FFFF less than 50 ppmw may be transferred offsite in accordance with the following:
 - a) The permittee or transferee must demonstrate that less than 5 percent of the HAP in Table 9 to Subpart FFFF is emitted from the waste management units up to the activated sludge unit.
 - b) The transferee must treat the wastewater stream or residual in a biological treatment unit in accordance with Subpart G §§63.138 and §63.145 and the requirements referenced therein.
- d. The permittee may elect to transfer a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream to an on-site treatment operation not owned or operated by the permittee, or to an off-site treatment operation. [§2103.12.a; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.132(g)]
 - 1) The permittee shall:
 - a) Comply with the provisions specified in §§63.133 through §63.137 for each waste management unit that receives or manages a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream prior to shipment or transport.
 - b) Include a notice with the shipment or transport of each Group 1 wastewater stream or residual removed from a Group 1 wastewater stream. The notice shall state that the wastewater stream or residual contains organic hazardous air pollutants that are to be treated in accordance with the provisions of 40 CFR Part 63, Subpart G. When the transport is continuous or ongoing (for example, discharge to a publicly-owned treatment works), the notice shall be submitted to the treatment operator initially and whenever there is a change in the required treatment.
 - 2) The permittee may not transfer the wastewater stream or residual unless the transferee has submitted to the EPA a written certification that the transferee will manage and treat any Group

- 1 wastewater stream or residual removed from a Group 1 wastewater stream received from a source subject to the requirements of 63 Subpart G in accordance with the requirements of either §§63.133 through 63.147, or §63.102(b) of 63 Subpart F. The certifying entity may revoke the written certification by sending a written statement to the EPA and the permittee giving at least 90 days notice that the certifying entity is rescinding acceptance of responsibility for compliance with the regulatory provisions listed in this paragraph. Upon expiration of the notice period, the permittee may not transfer the wastewater stream or residual to the treatment operation.
- 3) By providing this written certification to the EPA, the certifying entity accepts responsibility for compliance with the regulatory provisions listed in condition V.G.1.d.2) above with respect to any shipment of wastewater or residual covered by the written certification. Failure to abide by any of those provisions with respect to such shipments may result in enforcement action by the EPA against the certifying entity in accordance with the enforcement provisions applicable to violations of these provisions by the permittee.
 - 4) Written certifications and revocation statements, to the EPA from the transferees of wastewater or residuals shall be signed by the responsible official of the certifying entity, provide the name and address of the certifying entity, and be sent to the EPA Regional Office at the addresses listed in the Contact Information Section I. Such written certifications are not transferable by the treater.
- e. The permittee shall operate and maintain a fixed roof on Group 1 process wastewater tanks. The fixed roof shall meet the following requirements: [§2103.12.a; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.133(a); §63.133(b)(1)]
- 1) The fixed roof and all openings (e.g., access hatches, sampling ports, and gauge wells) shall be maintained in accordance with the requirements specified in conditions V.G.3.d through f below.
 - 2) Each opening shall be maintained in a closed position (e.g., covered by a lid) at all times that the wastewater tank contains a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment inspection, maintenance, or repair.
- f. If the permittee transfers Group 1 process wastewater to a container greater than 0.1 m³ (26.4 gallons), the permittee shall meet the requirements of §63.135. [§2103.12.a; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.135(a)]
- g. The permittee shall determine the annual average concentration and annual average flowrate for all process wastewater streams. [§2103.12.a; §2104.08; §63.2485(j)]
- h. The permittee shall prepare a maintenance wastewater plan. The plan shall at a minimum: [§2103.12.a; §2104.08; §63.2485(a); Subpart FFFF Table 7.2; §63.105(b)]
- 1) Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities.
 - 2) Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
 - 3) Specify the procedures to be followed when clearing materials from process equipment.
- i. The permittee shall modify and update the information required by V.G.1.h above for maintenance wastewater as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. [§2103.12.a; §2104.08; §63.2485(a); Subpart FFFF Table 7.2; §63.105(c)]

2. Testing Requirements:

None, except as provided elsewhere.

3. Monitoring Requirements:

- a. The permittee shall visually inspect Group 1 process wastewater tanks semiannually for leaks in the fixed roof and all openings. [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.133(f); §63.143(a)]
- b. Except as provided in the delay of repair provisions of conditions V.G.3.d through h below, if the permittee identifies a leak in the inspection required under condition V.G.3.a above, first efforts at repair shall be made no later than 5 calendar days after identification, and repair shall be completed within 45 calendar days after identification. If a failure cannot be repaired within 45 calendar days and if the vessel cannot be emptied within 45 calendar days, the permittee may utilize up to 2 extensions of up to 30 additional calendar days each. Documentation of a decision to utilize an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be emptied as soon as practical. [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.133(h); §63.148(b)]
- c. Leaks, as indicated by an instrument reading greater than 500 parts per million above background or by visual inspections, shall be repaired as soon as practicable, except as provided in conditions V.G.3.d through h below. [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.148(d)]
 - 1) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
 - 2) Repair shall be completed no later than 15 calendar days after the leak is detected.
- d. Delay of repair of a fixed roof on process wastewater tanks for which leaks have been detected is allowed if the repair is technically infeasible without a shutdown, as defined in §63.101 of 63 Subpart F, or if the permittee determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next shutdown. [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.148(e); §63.140(a)]
- e. Delay of repair of process wastewater tanks is allowed if the tank is emptied or is no longer used to treat or manage Group 1 wastewater streams or residuals removed from Group 1 wastewater streams. [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.140(b)]
- f. Delay of repair of process wastewater tanks is also allowed if additional time is necessary due to the unavailability of parts beyond the control of the permittee. Repair shall be completed as soon as practical. The permittee shall comply with the requirements of condition V.G.4.b.2) to document the reasons that the delay of repair was necessary. [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.140(c)]
- g. If the fixed roof of process wastewater tanks is designated, as described in condition V.G.4.c.1), as unsafe to inspect are exempt from the inspection requirements of condition V.G.3.a if: [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.148(g)]

- 1) The permittee determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with condition V.G.3.a; and
 - 2) The permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times.
- h. If the fixed roof of process wastewater tanks is designated, as described in condition V.G.4.c.2), as difficult to inspect are exempt from the inspection requirements of condition V.G.3.a if: [§2103.12.i; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.148(h)]
- 1) The permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and
 - 2) The permittee has a written plan that requires inspection of the equipment at least once every 5 years.

4. Record Keeping Requirements:

- a. The permittee shall keep a record of the notice sent to the treatment operator stating that the process wastewater stream or residual contains organic hazardous air pollutants which are required to be managed and treated in accordance with the provisions 40 CFR Part 63 Subpart FFFF and Subpart G. [§2103.12.j; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.147(a)]
- b. The permittee shall keep in a readily accessible location the following records: [§2103.12.j; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.147(b)(1) & (7)]
 - 1) The record that each process wastewater tank inspection required under condition V.G.3.a was performed.
 - 2) Documentation of a decision to use a delay of repair due to unavailability of parts, as specified in V.G.3.f, shall include a description of the failure, the reason additional time was necessary (including a statement of why replacement parts were not kept on site and when the manufacturer promised delivery), and the date when repair was completed.
- c. The permittee shall record the following information for process wastewater tanks: [§2103.12.j; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.148(i)(1), (2), & (4)]
 - 1) Identification of all parts of the fixed roof that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment.
 - 2) Identification of all parts of the fixed roof that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment.
 - 3) For each inspection during which a leak is detected, a record of the following information:
 - a) The instrument identification numbers; operator name or initials; and identification of the equipment.
 - b) The date the leak was detected and the date of the first attempt to repair the leak.
 - c) Maximum instrument reading measured by the method specified in condition V.G.3.c after the leak is successfully repaired or determined to be nonrepairable.
 - d) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - e) The name, initials, or other form of identification of the permittee (or designee) whose decision it was that repair could not be effected without a shutdown.
 - f) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.

- g) Dates of shutdowns that occur while the equipment is unrepaired.
 - h) The date of successful repair of the leak.
- d. The permittee shall incorporate the procedures described in conditions V.G.1.h and i above for maintenance wastewater as part of the startup, shutdown, and malfunction plan required under condition V.D.1.m. [§2103.12.j; §2104.08; §63.2485(a); Subpart FFFF Table 7.2; §63.105(d)]
- e. The permittee shall maintain a record of the information required by conditions V.G.1.h and i above for maintenance wastewater as part of the start-up, shutdown, and malfunction plan required under condition V.D.1.m. [§2103.12.j; §2104.08; §63.2485(a); Subpart FFFF Table 7.2; §63.105(e)]
- f. Whenever the permittee makes a change to any of the information submitted in the notification of compliance status report or a previous compliance report, the permittee shall document the change in the compliance report. The permittee shall submit a report 60 days before the scheduled implementation date of any change to the information contained in the precompliance report. The report shall contain the following information: [§2103.12.j; §2104.08; §63.2520(e)]
- 1) A description of the process change.
 - 2) Revisions to any of the information reported in the original notification of compliance status report.
 - a) Information required by the notification of compliance status report for changes involving the addition of processes or equipment. A description of the process change.
 - b) Revisions to any of the information reported in the original notification of compliance status report.
 - c) Information required by the notification of compliance status report for changes involving the addition of processes or equipment.

5. Reporting Requirements:

- a. The permittee shall report the following information to the Department in accordance with General Condition III.15 above The reports shall contain all required information for the time period of the report: [§2103.12.k.1]
- b. The permittee shall submit in the semiannual report required under General Condition III.15, the information required under condition V.G.4.c.3) above. [§2103.12.k; §2104.08; §63.2485(a); Subpart FFFF Table 7.1; §63.148(j)(1)]

6. Work Practice Standard:

None, except as provided elsewhere.

VI. MISCELLANEOUS**A. Boiler B001 & B002: Paint Plant – Boilers No. 1a and No. 2**

Facility ID: Boiler #1a and Boiler #2
Max. Design Rate: 25.1 MMBtu/hr, each
Primary Fuel: Natural Gas
Secondary Fuel: #2 Fuel Oil
Control Device(s): none

1. Restrictions:

- a. Only natural gas shall be combusted in the boilers except in the case of emergencies when No.2 fuel oil meeting the specifications defined by ASTM D396-78, “Standard Specifications for Fuel Oils,” may be used. [§2103.12.a.2.B]
- b. Heat input in each boiler shall be limited to 25.1 MMBtu/hr based on the higher heating value of the fuel being combusted. [§2103.12.a.2.B; OP #5048898-000-76200; OP #5048898-000-00900]
- c. Combustion of fuel oil shall be limited to 89,600 gallons in each boiler during any 12 consecutive months. [§2103.12.a.2.B]
- d. Combustion of fuel oil shall be limited to 500 hours per 12-month period. [§2103.12.a.2.B]
- e. The permittee shall not combust or allow to be combusted fuel oil with greater than 0.05% sulfur content at any time. [§2103.12.a.2.B; OP #5048898-000-76200; OP #5048898-000-00900]
- f. Emissions from Boiler #1a and Boiler #2 shall not exceed the values in Table VI-A-1 at any time: [§2103.12.a; OP #5048898-000-76200; OP #5048898-000-00900; 25 Pa. Code §129.96(c)]

Table VI-A-1: Boiler 1a and 2 Emission Limits

Pollutant	Short-Term¹ lb/hr	Long-Term¹ tpy²	Total tpy²
Particulate Matter	0.025	0.110	0.220
Particulate Matter <10 µm (PM ₁₀)	0.025	0.110	0.220
Particulate Matter <2.5 µm (PM _{2.5})	0.025	0.110	0.220
Nitrogen Oxides (NO _x)	4.518	19.789	39.578
Sulfur Oxides (SO _x)	1.273	0.3182	0.7624
Carbon Monoxide (CO)	0.377	1.649	3.298
Volatile Organic Compounds (VOCs)	0.100	0.440	0.880

1. Per Boiler.
2. A year is defined as any 12 consecutive months.

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 entitled "Emissions Testing". [IP #0057-I009, V.A.2; §2103.12.h.1]

3. Monitoring Requirements:

Compliance with the fuel oil sulfur limitations of Condition VI.A.1.d above may be determined based on a certification obtained from the fuel supplier meeting the requirements of Condition VI.A.4.b below. [§2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall record and maintain records of the monthly fuel natural gas consumption and daily fuel oil consumption. [§2103.12.j]
- b. Records of fuel supplier certifications used to demonstrate compliance with the sulfur limitations of this permit shall include the following information: [§2103.12.j]
 - 1) The name of the oil supplier
 - 2) Percent sulfur (by weight), and
 - 3) A statement from the fuel supplier that the oil complies with the specifications for fuel oil under ASTM D396-78.

5. Reporting Requirements:

Until terminated by written notice from the Department, the requirement for the permittee to report cold starts 24 hours in advance in accordance with Site Level Condition IV.9 is waived and the permittee may report all cold starts in the semi-annual compliance report required under General Condition III.15. [§2103.12.k; §2108.01.d]

6. Work Practice Standard:

None except as provided elsewhere.

B. Boiler B003: Paint Plant – Warehouse Boiler

Facility ID: Warehouse Boiler
Max. Design Rate: 8.4 MMBtu/hr
Primary Fuel: Natural Gas
Secondary Fuel: #2 Fuel Oil
Control Device(s): none

1. Restrictions:

- a. Only natural gas shall be combusted except in the case of emergencies when No.2 fuel oil meeting the specifications defined by ASTM D396-78, “Standard Specifications for Fuel Oils,” may be used. [§2103.12.a.2.B]
- b. Heat input in shall be limited to 8.4 MMBtu/hr based on the higher heating value of the fuel being combusted. [§2103.12.a.2.B; OP #5048898-001-00902]
- c. Combustion of fuel oil shall be limited to 30,000 gallons during any 12 consecutive months. [§2103.12.a.2.B]
- d. Combustion of fuel oil shall be limited to 500 hours per 12-month period. [§2103.12.a.2.B]
- e. The permittee shall not combust or allow to be combusted fuel oil with greater than 0.05% sulfur content at any time. [§2103.12.a.2.B; OP #5048898-001-00902]
- f. Emissions from the Warehouse Boiler shall not exceed the values in Table VI-B-1 at any time: [§2103.12.a; OP #5048898-001-00902; 25 Pa. Code §129.96(c)]

Table VI-B-1: Warehouse Boiler Emission Limits

Pollutant	Short-Term lb/hr	Long-Term tpy ¹
Particulate Matter	0.008	0.037
Particulate Matter <10 µm (PM ₁₀)	0.008	0.037
Particulate Matter <2.5 µm (PM _{2.5})	0.008	0.037
Nitrogen Oxides (NO _x)	1.512	6.623
Sulfur Oxides (SO _x)	0.4260	0.107
Carbon Monoxide (CO)	0.126	0.552
Volatile Organic Compounds (VOCs)	0.034	0.147

1. A year is defined as any 12 consecutive months.

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 entitled “Emissions Testing”. [IP #0057-I009, V.A.2; §2103.12.h.1]

3. Monitoring Requirements:

Compliance with the fuel oil sulfur limitations of Condition VI.B.1.d above may be determined based on a certification obtained from the fuel supplier meeting the requirements of Condition VI.B.4.b below. [§2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall record and maintain records of the monthly fuel natural gas consumption and daily fuel oil consumption. [§2103.12.j]
- b. Records of fuel supplier certifications used to demonstrate compliance with the sulfur limitations of this permit shall include the following information: [§2103.12.j]
 - 1) The name of the oil supplier
 - 2) Percent sulfur (by weight), and
 - 3) A statement from the fuel supplier that the oil complies with the specifications for fuel oil under ASTM D396-78.

5. Reporting Requirements:

Until terminated by written notice from the Department, the requirement for the permittee to report cold starts 24 hours in advance in accordance with Site Level Condition IV.9 is waived and the permittee may report all cold starts in the semi-annual compliance report required under General Condition III.15. [§2103.12.k; §2108.01.d]

6. Work Practice Standard:

None except as provided elsewhere.

C. Paint Plant – Spray Booths**Table VI-C-1: List of Spray Booths**

Spray Booths Name
COEX Lab Spray Booth #1
COEX Lab Spray Booth #2
1 st Floor General Industrial Lab Spray Booth
TRIX Cell Dispense Cell Lab Spray Booth
SDCC Cell Dispense Cell Lab Spray Booth
Dispersion Cell Spray Booth
1 st Floor Conductive Coatings Spray Booth
ADD Cell Dispense Lab Spray Booth
Ransburg Lab Spray Booth
Quality Assurance Lab Spray Booth
Color Lab Spray Booth
Basement General Industrial Spray Booth
Harley (Clean Room) Spray Booth
Development Lab Spray Booth

1. Restrictions:

- a. The spray guns shall be maintained and operated according to manufacturer's recommendations and good engineering practice. [§2103.12.a.2.B; §2105.03]
- b. Each paint spray booth shall be equipped with properly installed and maintained overspray filters. The filters shall be operated at all times during which the spray booth is in operation. [§2103.12.a.2.B; §2105.03]
- c. The permittee shall not use any cleaning material that contains organic HAPs. [§2103.12.a.2.B]

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 entitled "Emissions Testing". [IP #0057-I009, V.A.2; §2103.12.h.1]

3. Record Keeping Requirements:

- a. The permittee shall keep and maintain records of the following: [§2103.12.a.2.B; §2103.12.j]
 - 1) Total amount of coatings used in all spray booths;
 - 2) Total amount of solvent used in all spray booths.

D. Paint Plant – Storage Tanks

Tank ID	Capacity (gallons)	Tank ID	Capacity (gallons)
Tanks 103-104	30,000 ea.	Tank 311	12,000
Tank 224	25,000	Tank 312	12,000
Tank 225	30,000	Tank 313	12,000
Tanks 301-302	25,000 ea.	Tank 314	12,000
Tank 303	12,000	Tank 320	25,000
Tank 305	12,000	Tank 321	10,000
Tank 306	12,000	Tank 322	20,000
Tank 307	12,000	Tank 324	10,000
Tank 308	12,000	Tanks 400-402	30,000 ea.

1. Restrictions:

- a. The permittee shall store all materials in accordance with Site Level Condition IV.17. [§2103.12.a.2.B; §2105.12.a]
- b. Total emissions from the Paint Plant Storage Tanks shall not exceed the values in Table VI-D-1 at any time: [§2103.12.a.2.B; 25 Pa. Code §129.96(c)]

Table VI-D-1: Paint Plant Storage Tank Emission Limits

Pollutant	Emissions tpy ¹
Volatile Organic Compounds (VOCs)	2.14
Hazardous Air Pollutants (HAPs)	2.14

1. A year is defined as any 12 consecutive months.

2. Record Keeping Requirements:

- a. The permittee shall record and maintain records of the material stored in each tank as well as the maximum true vapor pressure. [§2103.12.j]
- b. The permittee shall record and maintain records of the total yearly throughput of material in each tank. [§2103.12.j]

E. Development Center – Storage Tanks

Tank ID	Capacity (gallons)
Tank 1	5,000
Tank 2	5,200
Tank 3	5,000
Tank 4	5,000
Tank 5	5,000
Tanks 6-8	5,000 ea.
Tank BT122	5,000
Tank BT126	5,000

1. Restrictions:

- a. The permittee shall store all materials in accordance with Site Level Condition IV.17. [§2103.12.a.2.B; §2105.12.a]
- b. Total emissions from the Development Center Storage Tanks shall not exceed the values in Table VI-E-1 at any time: [§2103.12.a.2.B; 25 Pa. Code §129.96(c)]

Table VI-E-1: Development Center Storage Tank Emission Limits

Pollutant	Emissions tpy¹
Volatile Organic Compounds (VOCs)	0.687
Hazardous Air Pollutants (HAPs)	0.687

1. A year is defined as any 12 consecutive months.

2. Record Keeping Requirements:

- a. The permittee shall record and maintain records of the material stored in each tank as well as the maximum true vapor pressure. [§2103.12.j]
- b. The permittee shall record and maintain records of the total yearly throughput of material in each tank. [§2103.12.j]

F. Make-Up Air Units

I.D	Location	Name	Rating
MAU 1	Paint Plant	Lab Make-Up Air Unit	1.6 MMBtu/hr
MAU 2		Aluminum Extrusion Make-Up Air Unit	1.89 MMBtu/hr
MAU 3		Basement Make-Up Air Unit	3.93 MMBtu/hr
MAU 4		Lab Make-Up Air Unit	2.52 MMBtu/hr
MAU 5		Plant Make-Up Air Unit	0.6 MMBtu/hr
MAU 6		Plant Make-Up Air Unit	0.53 MMBtu/hr
MAU 23		Plant Make-Up Air Unit	0.55 MMBtu/hr
SJPX		Warehouse Cell Make-Up Air Unit	0.4 MMBtu/hr
DC MAU	Development Center	Automated Spray Lab Make-Up Air Unit	0.5 MMBtu/hr
DC		Make-Up Air Heater: DC	3.0 MMBtu/hr
K13/K15		Make-Up Air Heater: K13/K15	1.0 MMBtu/hr
R2000		Make-Up Air Heater: R2000	1.0 MMBtu/hr
Reznor		Make-Up Air Heater: Reznor	0.4 MMBtu/hr

1. Restrictions:

- a. The permittee shall not operate or allow to be operated any make-up air unit in such manner that emissions of particulate matter exceed 0.008 lb/MMBtu. [§2104.02.a.1.A; IP #0057-I009, V.B.1.a]
- b. The permittee shall not operate or allow to be operated any make-up air unit using a fuel other than utility-grade natural gas. [§2103.12.a.2.B; IP #0057-I009, V.B.1.b]
- c. Total emissions from the Paint Plant Make-Up Air Units shall not exceed the values in Table VI-F-1 at any time: [§2103.12.a.2.B; IP #0057-I009, V.B.1.c; 25 Pa. Code §129.96(c)]

Table VI-F-1: Paint Plant Make-Up Air Unit Emission Limits

Pollutant	Emissions tpy ¹
Particulate Matter	0.42
Particulate Matter <10 µm (PM ₁₀)	0.42
Particulate Matter <2.5 µm (PM _{2.5})	0.42
Nitrogen Oxides (NO _x)	5.11
Sulfur Oxides (SO _x)	0.03
Carbon Monoxide (CO)	4.29
Volatile Organic Compounds (VOC)	0.28

1. A year is defined as any 12 consecutive months.

- d. Total emissions from the Development Center Make-Up Air Units shall not exceed the values in Table VI-F-2 at any time: [§2103.12.a.2.B; IP #0057-I009, V.B.1.c; 25 Pa. Code §129.96(c)]

Table VI-F-2: Development Center Make-Up Air Unit Emission Limits

Pollutant	Emissions tpy¹
Particulate Matter	0.21
Particulate Matter <10 µm (PM ₁₀)	0.21
Particulate Matter <2.5 µm (PM _{2.5})	0.21
Nitrogen Oxides (NO _x)	2.51
Sulfur Oxides (SO _x)	0.02
Carbon Monoxide (CO)	2.11
Volatile Organic Compounds (VOC)	0.14

1. A year is defined as any 12 consecutive months.

G. Sources of Minor Significance

The following table summarizes the processes and/or activities conducted at the PPG Industries, Inc. Springdale facility that were determined to be of minor significance:

TABLE VI-G-1 - Sources of Minor Significance

Location	Source Description	Basis for Exemption
Paint Plant	Boiler House Emergency Generator (natural gas-fired) – 27kW	Total PTE is <2.5 tpy of NO _x for all emergency generators
	Computer Room Emergency Generator (natural gas-fired) – 36 kW	
	Warehouse Emergency Generator (natural gas-fired) – 45 kW	
	Process Control Emergency Generator (natural gas-fired) – 27 kW	
	Guardhouse Emergency Generator (natural gas-fired) – 27 kW	
	Fire Pump & Engine (diesel-fired) – 256 hp	
	Inert Gas Generator	Unit is electric
	20 – Laboratory Hoods	Laboratory equipment used exclusively for chemical or physical analyses
	26 – Laboratory Ovens (electric)	Units are electric
	1 – Laboratory Oven (natural gas-fired) – 40,000 Btu/hr	Units are <0.5 MMBtu/hr; total PTE is <0.6 tpy of NO _x and <0.5 tpy of CO for all Laboratory Ovens at the facility
	4 – Laboratory Ovens (natural gas-fired) – 50,000 Btu/hr ea.	
	1 – Laboratory Oven (natural gas-fired) – 200,000 Btu/hr	
	Conductive Coatings Operations	Tanks vent to RTO; PTE <0.1 tpy VOC and HAP.
	Coil Lab	Laboratory equipment used exclusively for chemical or physical analyses
	Dispersion Lab	Laboratory equipment used exclusively for chemical or physical analyses
General Lab Ventilation	Laboratory equipment used exclusively for chemical or physical analyses	
Research Building	2 – Automated Paint Spray Booth Ovens	Units are each 50,000 Btu/hr
	Laboratory Hoods	Laboratory equipment used exclusively for chemical or physical analyses
	Electric Ovens	Units are electric

Location	Source Description	Basis for Exemption
	Powder Coat Spray Booth and Dust Collector	Laboratory equipment used exclusively for chemical or physical analyses
	8 – Laboratory Spray Booths	
	Emergency Generator (diesel –fired) – 410 kW	Total PTE is <2.5 tpy of NO _x for all emergency generators
	2 – Laboratory Ovens (natural gas-fired) – 40,000 Btu/hr ea.	Units are <0.5 MMBtu/hr; total PTE is <0.6 tpy of NO _x and <0.5 tpy of CO for all Laboratory Ovens at the facility
	6 – Laboratory Ovens (natural gas-fired) – 50,000 Btu/hr ea.	
	2 – Laboratory Ovens (natural gas-fired) – 55,000 Btu/hr ea.	
	Laboratory Oven (natural gas-fired) – 300,000 Btu/hr	
	Laboratory Oven (natural gas-fired) – 80,000 Btu/hr	
	Laboratory Oven (natural gas-fired) – 65,000 Btu/hr	
	Electric Hot Oil Heater	Unit is electric
	Space Heaters	Units are electric
	Facility	Parking Lots and Roadways

1. Restrictions:

- a. The permittee shall not operate or allow to be operated the Warehouse Emergency Generator or the Fire Pump & Engine in such manner that emissions of particulate matter exceed 0.015 lb/MMBtu. [§2104.02.a.1.B]
- b. The permittee shall not operate or allow to be operated any emergency generator using a fuel other than No. 2 Fuel Oil meeting the specifications defined by ASTM D396-78, “Standard Specification for Fuel Oils.” [§2103.12.a.2.B]
- c. The permittee shall not operate or allow to be operated the Automated Paint Spray Booth ovens or any laboratory oven using a fuel other than utility-grade natural gas. [§2103.12.a.2.B]
- d. Each emergency generator shall not be operated for more than 500 hours, including operation for maintenance checks and readiness testing, in any 12-month period. [§2103.12.a.2.B]
- e. The permittee shall not operate or allow to be operated the Powder Coat Spray Booth unless the baghouse is in operation and filter cartridges are in use. [§2103.12.a.2.B]
- f. The permittee shall not use any HAP-containing solvents in the cleaning of the spray guns in the Powder Coat Spray Booth. [§2103.12.a.2.B]

VII. ALTERNATIVE OPERATING SCENARIOS

No alternative operating scenarios exist for this facility.

VIII. EMISSIONS LIMITATIONS SUMMARY

The annual emission limitations for PPG Industries Inc. - Springdale facility are summarized in the following table:

TABLE VIII-1: Emission Limitations Summary

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	7.84
Particulate Matter <10 µm (PM ₁₀)	7.14
Particulate Matter <2.5 µm (PM _{2.5})	7.01
Nitrogen Oxides (NO _x)	56.02
Sulfur Oxides (SO _x)	0.80
Carbon Monoxide (CO)	12.08
Volatile Organic Compounds (VOC)	280.31
Hazardous Air Pollutants (HAP)	143.60

* A year is defined as any consecutive 12-month period.

EXHIBIT 2




AIR QUALITY PROGRAM
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1811

Minor Modification
INSTALLATION PERMIT

Issued To: PPG Industries, Inc.
125 Colfax Street
Springdale Boro, PA 15144-1506

ACHD Permit#: 0057-I005c
Date of Issuance: May 24, 2007
Amendment Date: February 28, 2020
Expiration Date: (See Section III.12)

Issued By: 
JoAnn Truchan, P.E.
Section Chief, Engineering

Prepared By: 
Bernadette Lipari
Air Quality Engineer

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AMENDMENTS:

<i>DATE</i>	<i>SECTION(S)</i>
12/12/08	III.15.d – semiannual reporting requirements were revised to be consistent with other installation permits at the facility.
07/26/07	V.A.1.b.2 and V.A.1.b.2 - ppm by weight was corrected to ppm by volume, dry basis; V.A.3.c and V.B.3.c were modified to require the permittee to install a CMS only if compliance will be demonstrated via outlet concentration (rather than control efficiency); ppm by weight was corrected to ppm by volume, dry basis; spelling of amount was corrected.
10/07/09	Section I – revised facility contact; V.A.5.a and V.B.5.a – revised reporting requirements to be consistent with each other; V.B.1.b.1) – added the word “or” after the condition; V.B.5 – revised cross-references.
02/28/20	Section V.A. – revised Paint Plant thermal oxidizer efficiency; V.A.1.b.1) – revised the Paint Plant RTO to 98% efficiency to conform to the requirements of the 2008/2015 Ozone RACT and V.A.1.d – revised the emission limits to meet 98% RTO efficiency.

I. CONTACT INFORMATION

Facility Location: PPG Industries, Inc. – Springdale Plant
125 Colfax Street
Springdale, PA 15144-1506

Permittee/Owner: PPG Industries, Inc.
One PPG Place
Pittsburgh, PA 15272-0000

**Permittee/Operator:
(if not Owner)** PPG Industries, Inc.
125 Colfax Street
Springdale, PA 15144-1506

Responsible Official: Mr. Perry Johnson
Title: Plant Manager – Industrial Coatings
Company: PPG Industries, Inc. – Springdale Plant
Address: 125 Colfax Street
Springdale, PA 15144-1506
Telephone Number: (412) 995-0662
Fax Number: (724) 274-3871

Facility Contact: Mr. Michael Webb Mr. Todd Mikes
Title: Paint Plant Development Center
EHS Manager EHS Manager
Telephone Number: (724) 274-3889 (724) 274-3495
Fax Number: (724) 274-3871 (724) 274-3871
E-mail Address: mwebb@ppg.com oftlikes@ppg.com

AGENCY ADDRESSES:

ACHD Engineer: Bernadette Lipari
Title: Air Quality Engineer
Telephone Number: (412) 578-8142
Fax Number: (412) 578-8144
E-mail Address: bernadette.lipari@alleghenycounty.us

ACHD Contact: Chief Engineer
Allegheny County Health Department
Air Quality Program
301 39th Street, Building #7

Pittsburgh, PA 15201-1811

EPA Contact: Enforcement Programs Section (3AP12)
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

II. FACILITY DESCRIPTION

FACILITY DESCRIPTION

PPG Industries, Inc. – Springdale Plant is a paint manufacturing plant and research & development facility. The paint plant produces coatings for aluminum extrusions, general industrial and coil coating. Within the main paint manufacturing buildings is housed a series of technical laboratories providing testing and customer support for PPG Coatings. The paint manufacturing building also houses manufacturing support laboratories, which oversee the quality and other parameters of products, manufactured. The research and development plant provides scale-up support for resin manufacture and tests new resins used in coatings. The facility is a major source of volatile organic compounds (VOC’s) and hazardous air pollutants (HAP’s). It is a minor source of particulate matter (PM), particulate matter less than 10 microns (PM₁₀), nitrogen oxides (NO_x), sulfur oxides (SO_x), and carbon monoxide (CO).

INSTALLATION DESCRIPTION

This permit is for the removal of the existing 5.0 MMBtu/hr REECO thermal oxidizer and the installation of two new 1.6 MMBtu/hr regenerative thermal oxidizers (RTO’s). One RTO will be used to control emissions from the Paint Plant and the other will control emissions from the Development Center. Each RTO will be natural gas-fired and will be equipped with dust collectors for waste gas pre-treatment.

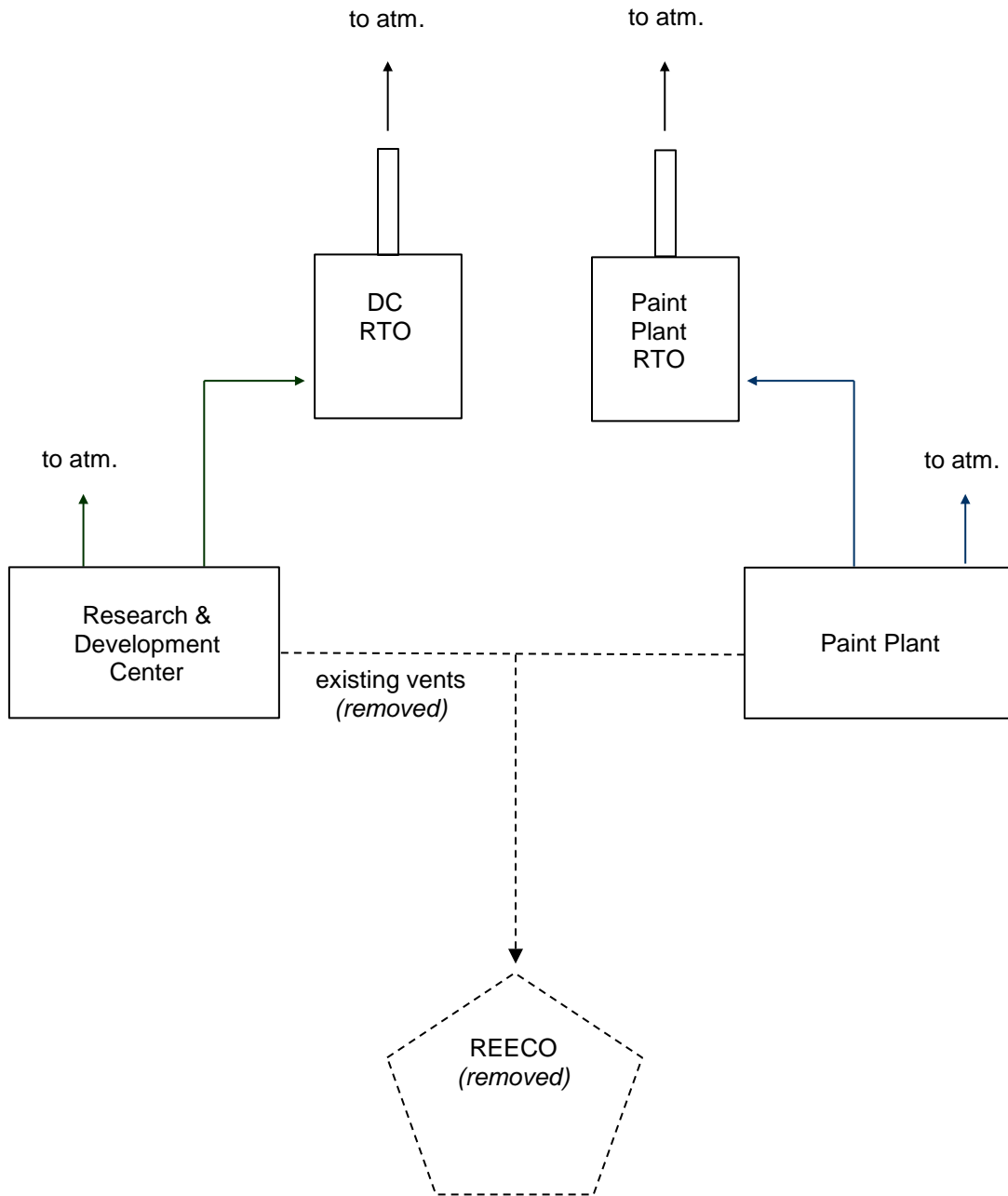
This installation permit modification revises the Paint Plant RTO efficiency to 98% to conform to the requirements of the 2008/2015 Ozone RACT II.

Installation Emission Unit Summary:

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	FUEL	STACK I.D.
P002a	Paint Plant	1.6 MMBtu/hr – Catalytic Combustion RTO; 2-stage filter baghouse	Natural Gas	S001
	5 - Mixers			
	9 – Premix Tanks			
	CP, F-Dock, U-Shaped, and Golf Ball Tanks			
	Lighting Fixture White Equipment			
	Co-Ex Primer Equipment			
	Still Vacuum Pump Exhaust			
	Sludge Tank Conservation Vent			
	Inert Gas Vent from Tank Washing			
	Environ Process			
	Trix Clears Process			
	Large Batch Cell Process			

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	FUEL	STACK I.D.
P002b	Development Center	1.6 MMBtu/hr – Catalytic Combustion RTO; 2-stage filter baghouse	Natural Gas	S002
	K13/K15 Reactor System			
	Large Side Reactor System			
	LUWA Filmtruder			
	BS5000 Resin Stripper			
	R2000 Reactor Process			

Process Flow Diagram



DECLARATION OF POLICY

Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.

The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.

III. GENERAL CONDITIONS – MINOR MODIFICATION**1. Prohibition of Air Pollution (§2101.11)**

It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

2. Nuisances (§2101.13)

Any violation of any requirement of this Permit shall constitute a nuisance.

3. Definitions (§2101.20)

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.
- b. Unless specified otherwise in this permit or in the applicable regulation, the term “year” shall mean any twelve (12) consecutive months.

4. Certification (§2102.01)

Any report or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or Article XXI, and all equivalent compliance techniques that have been approved by the Department, shall be properly installed, maintained, and operated consistent with good air pollution control practice.

6. Conditions (§2102.03.c)

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

7. Transfers (§2102.03.e)

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b.

8. Effect (§2102.03.g)

Issuance of this permit shall not in any manner relieve any person of the duty to fully comply with the requirements of Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of Article XXI or this Permit, whether occurring before or after the issuance of such permit. Further, the issuance of this permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of Article XXI or this Permit.

9. General Requirements (§2102.04.a)

It shall be a violation of this Permit giving rise to the remedies set forth in Article XXI §2109 for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment to which this Permit applies unless either:

- a. The Department has first issued an Installation Permit for such source or equipment; or
- b. Such action is solely a reactivation of a source with a current Operating Permit, which is approved under §2103.13 of Article XXI.

10. Conditions (§2102.04.e)

Further, the initiation of installation, modification, replacement, reconstruction, or reactivation under this

Installation Permit and any reactivation plan shall be deemed acceptance by the source of all terms and conditions specified by the Department in this permit and plan.

11. Revocation (§2102.04.f)

- a. The Department may, at any time, revoke this Installation Permit if it finds that:
- 1) Any statement made in the permit application is not true, or that material information has not been disclosed in the application;
 - 2) The source is not being installed, modified, replaced, reconstructed, or reactivated in the manner indicated by this permit or applicable reactivation plan;
 - 3) Air contaminants will not be controlled to the degree indicated by this permit;
 - 4) Any term or condition of this permit has not been complied with;
 - 5) The Department has been denied lawful access to the premises or records, charts, instruments and the like as authorized by this Permit; or
- b. Prior to the date on which construction of the proposed source has commenced the Department may, revoke this Installation Permit if a significantly better air pollution control technology has become available for such source, a more stringent regulation applicable to such source has been adopted, or any other change has occurred which requires a more stringent degree of control of air contaminants.

12. Term (§2102.04.g)

This Installation Permit shall expire in 18 months if construction has not commenced within such period or shall expire 18 months after such construction has been suspended, if construction is not resumed within such period. In any event, this Installation Permit shall expire upon completion of construction, except that this Installation Permit shall authorize temporary operation to facilitate shakedown of sources and air cleaning devices, to permit operations pending issuance of a related subsequent Operating Permit, or to permit the evaluation of the air contamination aspects of the source. Such temporary operation period shall be valid for a limited time, not to exceed 180 days, but may be extended for additional limited periods, each not to exceed 120 days, except that no temporary operation shall be authorized or extended which may circumvent the requirements of this Permit.

13. Annual Installation Permit Administrative Fee (§2102.10.c & e)

No later than 30 days after the date of issuance of this Installation Permit and on or before the last day of the month in which this permit was issued in each year thereafter, during the term of this permit until a subsequent corresponding Operating Permit or amended Operating Permit is properly applied for, the owner or operator of such source shall pay to the Department, in addition to all other applicable emission and administration fees, an Annual Installation Permit Administration Fee in an amount of \$750.

14. Severability Requirement (§2103.12.l)

The provisions of this permit are severable, and if any provision of this permit is determined to by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

15. Reporting Requirements (§2103.12.k)

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All

instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.

- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
 - 1) One semiannual report is due by July 31 of each year for the time period beginning January 1 and ending June 30.
 - 2) One semiannual report is due by January 31 of each year for the time period beginning July 1 and ending December 31.
 - 3) The first semiannual report shall be due July 31, 2020 for the time period beginning on the issuance date of this permit through June 30, 2020.
- e. Reports may be emailed to the Department at aqreports@allegHENycounty.us in lieu of mailing a hard copy.

16. Minor Installation Permit Modifications (§2102.10.d)

Modifications to this Installation Permit may be applied for but only upon submission of an application with a fee in the amount of \$300 and where:

- a. No reassessment of any control technology determination is required; and
- b. No reassessment of any ambient air quality impact is required.

17. Violations (§2104.06)

The violation of any emission standard established by this Permit shall be a violation of this Permit giving rise to the remedies provided by Article §2109.02.

18. Other Requirements Not Affected (§2105.02)

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable federal, state, or county statute, rule, regulation, or the like, including, but not limited to, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology standards now or hereafter established by the EPA, and any applicable requirement of BACT or LAER as provided by Article XXI, any condition contained in this Installation Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Part I of Article XXI.

19. Other Rights and Remedies Preserved (§2109.02.b)

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit

20. Penalties, Fines, and Interest (§2109.07.a)

A source that fails to pay any fee required under this Permit or article XXI when due shall pay a civil penalty of 50% of the fee amount, plus interest on the fee amount computed in accordance with of Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have its permit revoked.

21. Appeals (§2109.10)

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

IV. SITE LEVEL TERMS AND CONDITIONS

1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, no person shall operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

3. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line.

4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

7. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the person responsible for such equipment shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the Department is obtained; provided, however, that no such report shall be required if the source(s) served by such air pollution control equipment is also shut down at all times that such equipment

- is shut down.
- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XI.
 - c. The prior report required by Site Level Condition IV.7.a above shall include:
 - 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
 - 2) The reasons for the shutdown;
 - 3) The expected length of time that the equipment will be out of service;
 - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
 - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions;
 - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
 - 7) Such other information as may be required by the Department.

8. Breakdowns (§2108.01.c)

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the person responsible for such equipment or source shall immediately, but in no event later than sixty (60) minutes after the commencement of the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.
- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
 - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
 - 2) The nature and probable cause of the breakdown.
 - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
 - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.
 - 5) The estimated quantity of each material being or likely to be emitted.
 - 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.
 - 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.

- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
- d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
- e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
- f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.

9. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the person responsible for such equipment shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant.

10. Monitoring of Malodorous Matter Beyond Facility Boundaries (§2104.04)

The permittee shall take all reasonable action as may be necessary to prevent malodorous matter from becoming perceptible beyond facility boundaries. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to insure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

11. Emissions Inventory Statements (§2108.01.e & g)

- a. Emissions inventory statements in accordance with §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.
- b. The failure to submit any report or update within the time specified, the knowing submission of

false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

12. Orders (§2108.01.f)

In addition to meeting the requirements Site Level Conditions IV.7 through IV.11, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

13. Violations (§2108.01.g)

The failure to submit any report or update thereof required by Site Level Conditions IV.7 through IV.12 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

14. Emissions Testing (§2108.02)

- a. **Orders:** No later than 60 days after achieving full production or 120 days after startup, whichever is earlier, the permittee shall conduct, or cause to be conducted, such emissions tests as are specified by the Department to demonstrate compliance with the applicable requirements of this permit and shall submit the results of such tests to the Department in writing. Upon written application setting forth all information necessary to evaluate the application, the Department may, for good cause shown, extend the time for conducting such tests beyond 120 days after startup but shall not extend the time beyond 60 days after achieving full production. Emissions testing shall comply with all applicable requirements of Article XXI, §2108.02.e.
- b. **Tests by the Department:** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements:** No later than 45 days prior to conducting any tests required by this permit, the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.
- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.

- e. **Violations:** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

15. Abrasive Blasting (§2105.51)

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting complies with all applicable requirements of Article XXI §2105.51.
- b. In addition to complying with all applicable provisions of §2105.51, no person shall conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

16. Asbestos Abatement (§2105.62, §2105.63)

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

17. Volatile Organic Compound Storage Tanks (§2105.12.a)

No person shall place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure of 1.5 psia or greater under actual storage conditions in any aboveground stationary storage tank having a capacity equal to or greater than 2,000 gallons but less than or equal to 40,000 gallons, unless there is in operation on such tank pressure relief valves which are set to release at the higher of 0.7 psig of pressure or 0.3 psig of vacuum or at the highest possible pressure and vacuum in accordance with State or local fire codes, National Fire Prevention Association guidelines, or other national consensus standard approved in writing by the Department. Petroleum liquid storage vessels that are used to store produced crude oil and condensate prior to lease custody transfer are exempt from these requirements.

18. Fugitive Emissions (§2105.49)

The person responsible for a source of fugitive emissions, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.

19. Episode Plans (§2106.02)

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

20. New Source Performance Standards (§2105.05)

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for any person to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if such person has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. Any person who operates, or allows to be operated, any source subject to any NSPS shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such standard. All notices, reports, test results and the like as are required by such standard shall be submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.

21. National Emission Standards for Hazardous Air Pollutants (§2104.08)

- a. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart FFFF – *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing*.

V. EMISSION UNIT LEVEL TERMS AND CONDITIONS

A. Process P002a: Paint Plant Thermal Oxidizer

Process Description: Regenerative Thermal Oxidizer (RTO) for VOC control from the Paint Plant sources listed in the Facility & Installation Description Table in Section II.
Capacity: 1.6 MMBtu/hr
Fuel: Natural Gas

1. Restrictions:

- a. The permittee shall not operate any Paint Plant sources listed in the Facility & Installation Description Table in Section II at any time while generating VOC emissions unless the Paint Plant RTO is in service and the thermal oxidizer and filter baghouse are operating properly. [§2102.04(b)(6)]
- b. The Paint Plant RTO shall be properly operated and maintained according to good engineering practices, manufacturer’s recommendations, and the following conditions at all times while treating process emissions: [§2102.04(b)(6); §2105.30; §2103.05;]
 - 1) A minimum VOC destruction efficiency of 98% by weight; or [25 Pa. Code §129.99]
 - 2) A VOC concentration less than 20 ppm by volume, dry basis.
- c. The RTO shall be operated at a minimum operating temperature of 1,500 °F or the temperature at which a destruction efficiency in condition V.A.1.b.1) above is demonstrated during the most recent stack test, whichever is greater. [§2102.04(b)(6); §2105.30(b); §2103.05; 25 Pa. Code §129.99]
- d. Emissions from the Paint Plant RTO shall not exceed the values in Table V.A.1 at any time: [§2102.04(b)(6)]

Table V.A.1: Paint Plant RTO Emission Limitations

POLLUTANT	Hourly Emissions (lb/hr)	Yearly Emissions (tons/yr)¹
Particulate Matter	0.013	0.056
Particulate Matter <10µm (PM ₁₀)	0.013	0.056
Nitrogen Oxides (NO _x)	0.180	0.790
Sulfur Oxides (SO _x)	0.001	0.005
Carbon Monoxide (CO)	0.152	0.664
Volatile Organic Compounds (VOCs)	2.38	10.42
Hazardous Air Pollutants (HAPs)	1.49	6.52

¹ A year is defined as any 12 consecutive months.

- e. The permittee shall not operate, nor allow to be operated, the thermal oxidizer using a fuel other than utility-grade natural gas. [§2102.04(b)(6)]

- f. The Paint Plant RTO shall be equipped with instrumentation that continuously monitors the thermal oxidizer combustion chamber temperature to within 0.75% of the temperature measured, and records to the nearest 1°F. The permittee shall at all times properly maintain and calibrate the continuous temperature monitor and recorder in accordance with manufacturer's specifications and good engineering practices. [§2102.04(b)(6)]

2. Testing Requirements

- a. The permittee shall conduct VOC and HAP emissions testing on the inlet and the outlet of the Paint Plant RTO to demonstrate compliance with conditions V.A.1.b.1) above and V.A.1.d above. Such testing shall be conducted in accordance with US EPA approved test methods and §2108.02 of Article XXI. The testing shall be performed after initial start-up and once every five (5) years after the most recent stack test. [§2103.12(h)(1); 25 Pa. Code §129.100]
- b. The permittee shall determine the minimum operating temperature from the most recent valid stack test that demonstrates compliance with the requirements in condition V.A.1.b and limits in condition V.A.1.d above, as approved by the Department. On and after the date the approved stack test results are available, the permittee shall operate the thermal oxidizer at or above the minimum temperature as observed during the compliant stack test. [§2103.12(h)(1); 25 Pa. Code §129.100]
- c. The permittee shall conduct all tests while operating the Paint Plant at maximum routine operating conditions. Documentation of the Paint Plant operating conditions shall be included in the stack test report. [§2108.02(e)(2)(A)]
- d. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing" and §2108.02. [§2103.12(h)(1)]

3. Monitoring Requirements

- a. The permittee shall externally inspect the Paint Plant RTO and associated ductwork weekly for proper operation as well as for integrity of the thermal oxidizer, refractory beds, process equipment, and gaseous collection systems. [§2102.04(b)(6); §2103.12(i)]
- b. The permittee shall externally inspect the Paint Plant RTO and associated ductwork weekly for proper operation as well as for integrity of the thermal oxidizer, refractory beds, process equipment, and gaseous collection systems. [§2102.04(b)(6); §2103.12(i)]
- c. The permittee shall continuously monitor and record the Paint Plant RTO combustion chamber to the nearest 1°F of actual temperature at all times while treating process emissions. [§2102.04(b)(6); §2103.12(i); 25 Pa. Code §129.100]
- d. If the permittee chooses to demonstrate compliance with the outlet concentration standard in condition V.A.1.b.2) above, then the permittee shall install and properly operate and maintain a continuous monitoring system (CMS) to measure and record the amount of VOC (in ppm by volume, dry basis) exiting the Paint Plant RTO stack. [§2102.04(b)(6); §2103.12(i)]

4. Record Keeping Requirements

- a. The temperature in the combustion chamber of the Paint Plant RTO shall be continuously recorded, at all times, while processing emissions from the Paint Plant. [§2103.12(j); 25 Pa. Code §129.100]
- b. The permittee shall maintain the following records for the thermal oxidizer unit: [§2103.12(j)]
 - 1) Hours of operation;
 - 2) All data required to demonstrate compliance with the minimum temperature requirements of condition V.A.1.c above;
 - 3) All data recorded under condition V.A.4.a above; and
 - 4) Records of operation, maintenance, inspection, calibration and/or replacement of combustion equipment.
- c. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance.
- d. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12(j)]

5. Reporting Requirements

- a. The permittee shall report the following information to the Department semiannually in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report: [§2103.12(k)(1)]
 - 1) Calendar dates covered in the reporting period;
 - 2) Hours of operation;
 - 3) Monthly high, low, and average thermal oxidizer temperature;
 - 4) Non-compliance information required to be recorded by condition V.A.4.c above; and
 - 5) A certified statement signed by the responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
- b. Reporting instances of non-compliance in accordance with condition V.A.5.a.4) above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12(k)(1)]

6. Work Practice Standard

The permittee shall calibrate, maintain, and operate all instrumentation, process equipment, and control equipment according to manufacturer's recommendations and the applicable terms and conditions of this permit. [§2105.03; 25 Pa. Code §129.99]

7. Additional Requirements

The permittee shall notify the Department in writing ten (10) days prior to start-up of the Paint Plant RTO. The installation of the equipment included in this permit shall be inspected and approved by the Department before being placed into normal operation. [§2102.04(b)(6)]

B. Process P002b: Development Center Thermal Oxidizer

Process Description: Regenerative Thermal Oxidizer (RTO) for VOC control from the Development Center sources K13/K15 Reactor System, Large Side Reactor System, LUWA Filmtruder, BS5000 Resin Stripper, and R2000 Reactor Process

Capacity: 1.6 MMBtu/hr

Fuel: Natural Gas

1. Restrictions:

- a. The permittee shall not operate the K13/K15 Reactor System, Large Side Reactor System, LUWA Filmtruder, BS5000 Resin Stripper, and R2000 Reactor Process at any time while generating VOC emissions unless the Development Center RTO is in service and the thermal oxidizer and filter baghouse are operating as required. [§2102.04(b)(6)]
- b. The Development Center RTO shall be properly operated and maintained according to good engineering practices, manufacturer’s recommendations, and the following conditions at all times while treating process emissions: [§2102.04(b)(6); §2105.30; §2103.05]
 - 1) The minimum VOC destruction efficiency shall be 98% by weight; or [§129.99]
 - 2) A VOC concentration less than 20 ppm by volume dry basis.
- c. The RTO shall be operated at a minimum operating temperature of 1,500 °F or the temperature at which a destruction efficiency in condition V.B.1.b.1) above is demonstrated during the most recent stack test, whichever is greater. [§2102.04(b)(6); §2105.30(b); §2103.05; §129.99]
- d. Emissions from the Development Center RTO shall not exceed the values in Table V.B.1 at any time: [§2102.04(b)(6)]

Table V.B.1: Emission Limitations

POLLUTANT	Hourly Emissions (lb/hr)	Yearly Emissions (tons/yr)¹
Particulate Matter	0.013	0.056
Particulate Matter <10µm (PM ₁₀)	0.013	0.056
Nitrogen Oxides (NO _x)	0.180	0.790
Sulfur Oxides (SO _x)	0.001	0.005
Carbon Monoxide (CO)	0.152	0.664
Volatile Organic Compounds (VOC's)	0.846	3.703
Hazardous Air Pollutants (HAP's)	0.846	3.703

¹ A year is defined as any 12 consecutive months.

- e. The permittee shall not operate, nor allow to be operated, the thermal oxidizer using a fuel other than utility-grade natural gas. [§2102.04(b)(6)]
- f. The Development Center RTO shall be equipped with instrumentation that continuously monitors

the thermal oxidizer combustion chamber temperature to within 0.75% of the temperature measured, and records to the nearest 1°F. The permittee shall at all times properly maintain and calibrate the continuous temperature monitor and recorder in accordance with manufacturer's specifications and good engineering practices. [§2102.04(b)(6)]

2. Testing Requirements

- a. The permittee shall conduct VOC and HAP emissions testing on the inlet and the outlet of the Development Center RTO to demonstrate compliance with the requirements in condition V.B.1.b.1) above and limits in condition V.B.1.d above. Such testing shall be conducted in accordance with US EPA approved test methods and §2108.02 of Article XXI. The testing shall be performed after initial start-up and once every five (5) years thereafter. [§2103.12(h)(1); §129.100]
- b. The permittee shall determine the minimum operating temperature from the most recent valid stack test that demonstrates compliance with limits in condition V.B.1.d above, as approved by the Department. On and after the date the approved stack test results are available, the permittee shall operate the thermal oxidizer at or above the minimum temperature as observed during the compliant stack test. [§2103.12(h)(1); §129.100]
- c. The permittee shall conduct all tests while operating the Research and Development Center at maximum routine operating conditions. [§2108.02(e)(2)(A)]
- d. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12(h)(1)]

3. Monitoring Requirements

- a. The permittee shall externally inspect the Development Center RTO and associated ductwork weekly for proper operation as well as for integrity of the thermal oxidizer, refractory beds, process equipment, and gaseous collection systems. [§2102.04(b)(6); §2103.12(i)]
- b. The permittee shall continuously monitor and record the Development Center RTO combustion chamber to the nearest 1°F of actual conditions at all times while treating process emissions. [§2102.04(b)(6); §2103.12(i) ; §129.100]
- c. If the permittee chooses to demonstrate compliance with the outlet concentration standard in condition V.B.1.b.2) above, then the permittee shall install and properly operate and maintain a continuous monitoring system (CMS) to measure and record the amount of VOC (in ppm by volume, dry basis) exiting the Development Center RTO stack. [§2102.04(b)(6); §2103.12(i)]

4. Record Keeping Requirements

- a. The temperature in the combustion chamber of the Development Center RTO shall be continuously recorded, at all times, while processing emissions from the Development Center. [§2103.12(j) ; §129.100]
- b. The permittee shall maintain the following records for the thermal oxidizer unit: [§2103.12(j)]
 - 1) Hours of operation;

- 2) All data required to demonstrate compliance with the minimum temperature requirements of condition V.B.1.c above;
 - 3) All data recorded under condition V.B.4.a above; and
 - 4) Records of operation, maintenance, inspection, calibration and/or replacement of combustion equipment.
- c. The permittee shall keep records of the Development Center RTO destruction efficiency tests to demonstrate compliance with the requirements of §2105.06 of Article XXI and Order No. 254. Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements of §2105.06 of Article XXI and Order No. 254 are met. All data and information required to determine compliance shall be recorded and maintained by the facility as required by §2105.06 of Article XXI and Order No. 254. [RACT Order No. 254, condition 1.22; §129.100]
- d. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance.
- e. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12(j)]

5. Reporting Requirements

- a. The permittee shall report the following information to the Department in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report: [§2103.12(k)(1)]
- 1) Calendar dates covered in the reporting period;
 - 2) Hours of operation;
 - 3) Monthly high, low, and average thermal oxidizer temperatures;
 - 4) Non-compliance information required to be recorded by condition V.B.4.d above; and
 - 5) A certified statement signed by the responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
- b. Reporting instances of non-compliance in accordance with condition V.B.5.a.4) above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12(k)(1)]

6. Work Practice Standard

The permittee shall calibrate, maintain, and operate all instrumentation, process equipment, and control equipment according to manufacturer's recommendations and the applicable terms and conditions of this permit. [§2105.03; §129.99]

7. Additional Requirements

The permittee shall notify the Department in writing ten (10) days prior to start-up of the Development Center RTO. The installation of the equipment included in this permit shall be inspected and approved by the Department before being placed into normal operation. [§2102.04(b)(6)]

VI. ALTERNATIVE OPERATING SCENARIOS

No alternative operating scenarios exist for this Installation.

VII. EMISSIONS LIMITATIONS SUMMARY

The annual emission limitations for the PPG Springdale Paint Plant and Development Center thermal oxidizers shall not exceed the following at any time:

TABLE VII-1: Emission Limitations Summary

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	0.112
Particulate Matter <10 µm (PM ₁₀)	0.112
Nitrogen Oxides (NO _x)	1.580
Sulfur Oxides (SO _x)	0.009
Carbon Monoxide (CO)	1.327
Volatile Organic Compounds (VOC)	14.166
Total Hazardous Air Pollutants (HAP)	10.22

* A year is defined as any consecutive 12-month period.

EXHIBIT 3



**AIR QUALITY PROGRAM
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1811**

**Minor Source/Minor Modification
INSTALLATION PERMIT**

<u>Issued To:</u>	PPG Industries, Inc. – Springdale 125 Colfax Street Springdale Boro., PA 15144-1506	ACHD Permit#:	0057-I011
		Date of Issuance:	January 27, 2022
		Expiration Date:	(See Section III.12)

Issued By: _____
JoAnn Truchan, P.E.
Section Chief, Engineering

Prepared By: _____
Bernadette Lipari
Air Quality Engineer

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AMENDMENTS:

<i>DATE</i>	<i>SECTION(S)</i>
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I. CONTACT INFORMATION

Facility Location: PPG Industries, Inc. – Springdale Plant
125 Colfax Street
Springdale Borough, PA 15144-1506

Permittee/Owner: PPG Industries, Inc.
One PPG Place
Pittsburgh, PA 15272-0000

Permittee/Operator: (Same as above)
(if not Owner)

Responsible Official: Will Olp
Title: Plant Manager
Company: PPG Industries, Inc. – Springdale Plant
Address: 125 Colfax Street
Springdale Borough, PA 15144-1506
Telephone Number: (724)-274-3455
Fax Number: (724) 274-3871

Facility Contact: Jeff Fyock
Title: EHS Manager
Telephone Number: (724)-274-3821
Fax Number: (724) 274-3871
E-mail Address: fyock@ppg.com

AGENCY ADDRESSES:

ACHD Contact: Chief Engineer
Allegheny County Health Department
Air Quality Program
301 39th Street, Building #7
Pittsburgh, PA 15201-1811

EPA Contact: Enforcement Programs Section (3AP12)
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

II. FACILITY DESCRIPTION

FACILITY DESCRIPTION

PPG Industries, Inc. – Springdale Plant is a paint manufacturing plant and research & development facility. The paint plant produces coatings for aluminum extrusions, general industrial, and coil coating. Within the main paint manufacturing buildings is housed a series of technical laboratories providing testing and customer support for PPG Coatings. The paint manufacturing building also houses manufacturing support laboratories, which oversee the quality and other parameters of products, manufactured. The research and development plant provides scale-up support for resin manufacture and tests new resins used in coatings.

The facility is a major source of volatile organic compounds (VOC’s) and hazardous air pollutants (HAP’s), and a minor source of particulate matter (PM), particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), nitrogen oxides (NO_x), sulfur oxides (SO_x), and carbon monoxide (CO) as defined in Article XXI, §2101.20. The facility is also a minor source of greenhouse gas emissions (CO₂e) as defined in the U.S. EPA Greenhouse Gas Tailoring Rule.

INSTALLATION DESCRIPTION

This permit is for the replacement of the Dispersion Process Basket Mill with a 20-liter Hochmeyer Mill and for the installation of two new 15-hp high-speed mixers in the Small Order Department. The Hochmeyer Mill and the two mixers will exhaust to the Paint Plant RTO and the PVC Line Baghouse. The Hochmeyer Mill’s expected maximum production is 15,000 gallons per year, an increase from the previous 5,000 gallons per year, and will be supported by the addition of three 300-gallon open-top portable tanks. The two mixers’ expected maximum production is 100,000 gallons per year, an increase from the previous 60,000 gallons per year, and will be supported by the addition of two 350-gallon open-top portable tanks.

The emission units regulated by this permit are summarized in Table II-1:

TABLE II-1: Emission Unit Identification

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK I.D.
P001, P002	Dispersion				
	Hochmeyer Mill	Paint Plant RTO/PVC line Baghouse	n/a (portable tanks)	pigment, resin, solvent	S001, S005
P001, P002	Small Order Department				
	2 – 15 hp high-speed disperser mixers	Paint Plant RTO/PVC line Baghouse	n/a (portable tanks)	pigment, resin, solvent	S001, S005

DECLARATION OF POLICY

Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.

The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.

III. GENERAL CONDITIONS

1. Prohibition of Air Pollution (§2101.11)

It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

2. Nuisances (§2101.13)

Any violation of any requirement of this Permit shall constitute a nuisance.

3. Definitions (§2101.20)

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.
- b. Unless specified otherwise in this permit or in the applicable regulation, the term “year” shall mean any twelve (12) consecutive months.

4. Certification (§2102.01)

Any report or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or Article XXI, and all equivalent compliance techniques that have been approved by the Department, shall be properly installed, maintained, and operated consistent with good air pollution control practice.

6. Conditions (§2102.03.c)

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

7. Transfers (§2102.03.e)

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b.

8. Effect (§2102.03.g)

Issuance of this permit shall not in any manner relieve any person of the duty to fully comply with the requirements of Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of Article XXI or this Permit, whether occurring before or after the issuance of such permit. Further, the issuance of this permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of Article XXI or this Permit.

9. General Requirements (§2102.04.a)

It shall be a violation of this Permit giving rise to the remedies set forth in Article XXI §2109 for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment to which this Permit applies unless either:

- a. The Department has first issued an Installation Permit for such source or equipment; or
- b. Such action is solely a reactivation of a source with a current Operating Permit, which is approved under §2103.13 of Article XXI.

10. Conditions (§2102.04.e)

Further, the initiation of installation, modification, replacement, reconstruction, or reactivation under this

Installation Permit and any reactivation plan shall be deemed acceptance by the source of all terms and conditions specified by the Department in this permit and plan.

11. Revocation (§2102.04.f)

- a. The Department may, at any time, revoke this Installation Permit if it finds that:
- 1) Any statement made in the permit application is not true, or that material information has not been disclosed in the application;
 - 2) The source is not being installed, modified, replaced, reconstructed, or reactivated in the manner indicated by this permit or applicable reactivation plan;
 - 3) Air contaminants will not be controlled to the degree indicated by this permit;
 - 4) Any term or condition of this permit has not been complied with;
 - 5) The Department has been denied lawful access to the premises or records, charts, instruments and the like as authorized by this Permit; or
- b. Prior to the date on which construction of the proposed source has commenced the Department may, revoke this Installation Permit if a significantly better air pollution control technology has become available for such source, a more stringent regulation applicable to such source has been adopted, or any other change has occurred which requires a more stringent degree of control of air contaminants.

12. Term (§2102.04.g)

This Installation Permit shall expire in 18 months if construction has not commenced within such period or shall expire 18 months after such construction has been suspended, if construction is not resumed within such period. In any event, this Installation Permit shall expire upon completion of construction, except that this Installation Permit shall authorize temporary operation to facilitate shakedown of sources and air cleaning devices, to permit operations pending issuance of a related subsequent Operating Permit, or to permit the evaluation of the air contamination aspects of the source. Such temporary operation period shall be valid for a limited time, not to exceed 180 days, but may be extended for additional limited periods, each not to exceed 120 days, except that no temporary operation shall be authorized or extended which may circumvent the requirements of this Permit.

13. Annual Installation Permit Administrative Fee (§2102.10.c & e)

No later than 30 days after the date of issuance of this Installation Permit and on or before the last day of the month in which this permit was issued in each year thereafter, during the term of this permit until a subsequent corresponding Operating Permit or amended Operating Permit is properly applied for, the owner or operator of such source shall pay to the Department, in addition to all other applicable emission and administration fees, an Annual Installation Permit Administration Fee in an amount of \$750.

14. Severability Requirement (§2103.12.l)

The provisions of this permit are severable, and if any provision of this permit is determined to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

15. Reporting Requirements (§2103.12.k)

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All

instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.

- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
 - 1) One semiannual report is due by October 31 of each year for the time period beginning April 1 and ending September 30.
 - 2) One semiannual report is due by April 30 of each year for the time period beginning October 1 and ending March 31.
 - 3) The first semiannual report shall be due April 30, 2022 for the time period beginning on the issuance date of this permit through March 31, 2022.
- e. Reports may be emailed to the Department at aqreports@alleghenycounty.us in lieu of mailing a hard copy.

16. Minor Installation Permit Modifications (§2102.10.d)

Modifications to this Installation Permit may be applied for but only upon submission of an application with a fee in the amount of \$300 and where:

- a. No reassessment of any control technology determination is required; and
- b. No reassessment of any ambient air quality impact is required.

17. Violations (§2104.06)

The violation of any emission standard established by this Permit shall be a violation of this Permit giving rise to the remedies provided by Article §2109.02.

18. Other Requirements Not Affected (§2105.02)

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable federal, state, or county statute, rule, regulation, or the like, including, but not limited to, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology standards now or hereafter established by the EPA, and any applicable requirement of BACT or LAER as provided by Article XXI, any condition contained in this Installation Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Part I of Article XXI.

19. Other Rights and Remedies Preserved (§2109.02.b)

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit

20. Penalties, Fines, and Interest (§2109.07.a)

A source that fails to pay any fee required under this Permit or article XXI when due shall pay a civil penalty of 50% of the fee amount, plus interest on the fee amount computed in accordance with of Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have its permit revoked.

21. Appeals (§2109.10)

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

IV. SITE LEVEL TERMS AND CONDITIONS

1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, no person shall operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

3. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line.

4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

7. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the person responsible for such equipment shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the Department is obtained; provided, however, that no such report shall be required if the source(s) served by such air pollution control equipment is also shut down at all times that such equipment

is shut down.

- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XI.
- c. The prior report required by Site Level Condition IV.7.a above shall include:
 - 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
 - 2) The reasons for the shutdown;
 - 3) The expected length of time that the equipment will be out of service;
 - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
 - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions;
 - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
 - 7) Such other information as may be required by the Department.
- d. Shutdown reports may be emailed to the Department at aqreports@alleghenycounty.us in lieu of mailing a hard copy.

8. Breakdowns (§2108.01.c)

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the person responsible for such equipment or source shall immediately, but in no event later than sixty (60) minutes after the commencement of the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.
- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
 - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
 - 2) The nature and probable cause of the breakdown.
 - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
 - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.
 - 5) The estimated quantity of each material being or likely to be emitted.

- 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.
 - 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.
- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
 - d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
 - e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
 - f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.
 - g. Breakdown reports may be emailed to the Department at aqreports@alleghenycounty.us in lieu of mailing a hard copy.

9. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the person responsible for such equipment shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant. Cold start notifications may be emailed to the Department at aqreports@alleghenycounty.us.

10. Monitoring of Malodorous Matter Beyond Facility Boundaries (§2104.04)

The permittee shall take all reasonable action as may be necessary to prevent malodorous matter from becoming perceptible beyond facility boundaries. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to ensure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

11. Emissions Inventory Statements (§2108.01.e & g)

- a. Emissions inventory statements in accordance with §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.
- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

12. Orders (§2108.01.f)

In addition to meeting the requirements Site Level Conditions IV.7 through IV.11, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

13. Violations (§2108.01.g)

The failure to submit any report or update thereof required by Site Level Conditions IV.7 through IV.12 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

14. Emissions Testing (§2108.02)

- a. **New and Modified Sources:** No later than 60 days after achieving full production or 120 days after startup, whichever is earlier, the permittee shall conduct, or cause to be conducted, such emissions tests as are specified by the Department to demonstrate compliance with the applicable requirements of this permit and shall submit the results of such tests to the Department in writing. Upon written application setting forth all information necessary to evaluate the application, the Department may, for good cause shown, extend the time for conducting such tests beyond 120 days after startup but shall not extend the time beyond 60 days after achieving full production. Emissions testing shall comply with all applicable requirements of Article XXI, §2108.02.e.
- b. **Tests by the Department:** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements:** No later than 45 days prior to conducting any tests required by this permit, the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible

shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.

- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.
- e. **Violations:** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

15. Abrasive Blasting (§2105.51)

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting complies with all applicable requirements of Article XXI §2105.51.
- b. In addition to complying with all applicable provisions of §2105.51, no person shall conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

16. Asbestos Abatement (§2105.62, §2105.63)

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

17. Volatile Organic Compound Storage Tanks (§2105.12.a)

No person shall place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure of 1.5 psia or greater under actual storage conditions in any aboveground stationary storage tank having a capacity equal to or greater than 2,000 gallons but less than or equal to 40,000 gallons, unless there is in operation on such tank pressure relief valves which are set to release at the higher of 0.7 psig of pressure or 0.3 psig of vacuum or at the highest possible pressure and vacuum in accordance with State or local fire codes, National Fire Prevention Association guidelines, or other national consensus standard approved in writing by the Department. Petroleum liquid storage vessels that are used to store produced crude oil and condensate prior to lease custody transfer are exempt from these requirements.

18. Fugitive Emissions (§2105.49)

The person responsible for a source of fugitive emissions, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.

19. Episode Plans (§2106.02)

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

20. New Source Performance Standards (§2105.05)

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for any person to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if such person has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. Any person who operates, or allows to be operated, any source subject to any NSPS shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such standard. All notices, reports, test results and the like as are required by such standard shall be submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.

21. National Emission Standards for Hazardous Air Pollutants (§2104.08)

- a. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart HHHHH – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing for all applicable equipment and processes in the Paint Plant.
- b. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing for all applicable equipment and processes in the Development Center.

22. Facility-wide Emission Limitations

Production of coatings at the Paint Plant facility shall be limited to a total of 20,000,000 gallons during any 12 consecutive months.

V. EMISSION UNIT LEVEL TERMS AND CONDITIONS

A. New Mill and High-Speed Mixers: Paint Plant (Controlled Emissions)

Process Description: New mill and new mixers for increased production

Capacity: New mill (15,000 gal/year); new mixers (100,000 gal/year)

Raw Materials: Pigments/Solvents

Control Device: Paint Plant RTO and PVC Product Line Baghouse

As identified above, the new mill and high-speed mixers consist of the following number and type of equipment:

Equipment	Capacity	Control Device
Dispersion		
20 liter Hochmeyer Mill	20 liters each ¹	Paint Plant RTO (existing)/PVC Product Line Baghouse (existing)
Small Order Department		
2 – 15 hp high-speed disperser mixers	N/A (Portable Tanks)	Paint Plant RTO (existing)/PVC Product Line Baghouse (existing)

¹ N/A (Portable Tanks)

1. Restrictions:

- a. The permittee shall not operate or allow to be operated the equipment listed above unless such equipment is vented to the existing Paint Plant RTO and PVC Product Line Baghouse. [§2102.04.b.6]
- b. The PVC Product Line Baghouse shall meet the requirements of IP #0057-I007 issued on December 9, 2009. [§2102.04.b.6]
- c. The Paint Plant RTO shall meet the requirements of IP #0057-I005b issued on May 24, 2007 and amended on December 12, 2008. [§2102.04.b.6]
- d. The permittee shall equip each portable process vessel with a cover or lid that must be in place at all times when the vessel contains a HAP, except for material additions and sampling. The covers shall be maintained in good condition, such that when in place, they maintain contact with their respective rims for at least 90% of the circumference of the rim. [§2103.12.a; §2104.08; §63.8005(a)(1); 63 Subpart HHHHH Table 1.1; IP #0057-I004, V.A.1.b;]
- e. The permittee shall reduce emissions of total organic HAP from stationary process vessels by 98 percent (by weight) or greater by venting emissions through the existing Paint Plant regenerative thermal oxidizer (RTO) at all times when paint is being produced. [§2102.04.b.6; §63.8000.a; 40CFR Part 63 Subpart HHHHH Table 1.2.b.i; §63.8005.a.1; §63.983.a]
- f. The permittee shall meet the requirements of condition V.A.1.e above for emissions during automatic cleaning operations. [§63.7985.b; §63.8005.a1.ii]

2. Testing Requirements:

- a. The permittee shall conduct VOC and HAP emissions testing on the Paint Plant RTO in accordance with IP #0057-I005b issued on May 24, 2007 and amended on December 12, 2008. [§2102.04.b.6].
- b. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. [§2103.12.h.1; §63.997.c.2]

3. Monitoring Requirements:

- a. The permittee shall monitor the Paint Plant RTO in accordance with installation permit IP #0057-I005b issued on May 24, 2007 and amended on December 12, 2008. [§2102.04.b.6; §2103.12.i]
- b. The permittee shall monitor the PVC Product Line Baghouse in accordance with installation permit IP #0057-I005b issued on May 24, 2007 and amended on December 12, 2008. [§2103.12.i]
- c. Leak Detection and Repair [§63.8015.b; §63.424.a-d]
 - 1) The permittee shall perform a monthly leak inspection of all equipment in organic HAP service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment must be inspected when it is operating in organic HAP service.
 - 2) A log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in organic HAP service at the facility.
 - 3) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided below.
 - 4) Delay of repair of leaking equipment will be allowed upon a demonstration to the Department that repair within 15 days is not feasible. The permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed.

4. Record Keeping Requirements:

- a. The permittee shall maintain records for the Paint Plant RTO in accordance with installation permit IP #0057-I005b issued on May 24, 2007 and amended on December 12, 2008.
- b. The permittee shall maintain records for the PVC Product Line Baghouse in accordance with installation permit IP #0057-I005b issued on May 24, 2007 and amended on December 12, 2008.
- c. The permittee shall record the following information in the log book required by condition V.A.3.c.2) above for each leak that is detected: [§63.8015.b; §63.428.e]
 - 1) The equipment type and identification number;
 - 2) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
 - 3) The date the leak was detected and the date of each attempt to repair the leak;
 - 4) Repair methods applied in each attempt to repair the leak;
 - 5) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;

- 6) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - 7) The date of successful repair of the leak.
- d. The permittee shall keep and maintain records of each time a safety device is opened to avoid unsafe conditions. [§63.8000.b.2; §63.8080.c]
 - e. The log book required by condition V.A.3.c.2) above shall be maintained on site and shall be available for Department inspection at all times. [§2103.12.h.2.A-B; 2103.12.j.1-2]
 - f. All records required under this section shall be maintained by the permittee for a period of five years following the date of such record. [§2103.12.j.2]

5. Reporting Requirements:

- a. The permittee shall report the following information to the Department semiannually in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: [§2103.12.k.1; §63.8075.e.1-6; §63.999.c]
 - 1) Company name and address.
 - 2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) Throughput data required to be recorded by condition V.A.4.c above.
 - 5) Non-compliance information required to be recorded by condition V.A.4.g above.
- b. The permittee shall include in the semiannual report an excess emissions report for each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: [§63.8015(b); §63.428(h)(4)]
 - 1) The date on which the leak was detected;
 - 2) The date on which the leak was detected;
 - 3) The date of each attempt to repair the leak;
 - 4) The reasons for the delay of repair; and
 - 5) The date of successful repair.
- c. Reporting instances of non-compliance and malfunction does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. [§2102.04.b.4; §2108.01.c]
- d. Reporting instances of non-compliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k]

6. Work Practice Standard:

None except as provided elsewhere.

7. Additional Requirements:

The permittee shall notify the Department in writing ten (10) days prior to start-up of P001. Notification may be sent via email to the Department at agreports@alleghenycounty.us. Department reserves the right to inspect and approve the equipment before it is placed into normal operation. [§2102.04.b.6]

**ALLEGHENY COUNTY HEALTH
DEPARTMENT AIR QUALITY PROGRAM**

In the Matter of:

PPG Industries, Inc.
PPG Industries – Springdale Plant
125 Colfax Street
Springdale, PA 15144-1506

: Appeal of
: Title V Operating Permit No. 0057-
: OP18a, Minor Modification to
: Installation Permit No. 0057-I005C, and
: Installation Permit No. 0057-I011
:

ORDER

AND NOW, this _____ day of _____, 2023, it is hereby **ORDERED** that, after consideration of the Allegheny County Health Department’s Motion to Dismiss, the Motion to Dismiss is **GRANTED**. All claims raised by Appellants are **DISMISSED** with prejudice.

ALLEGHENY COUNTY HEALTH DEPARTMENT

JOHN F. MCGOWAN
ADMINISTRATIVE HEARING OFFICER

**ALLEGHENY COUNTY HEALTH
DEPARTMENT AIR QUALITY PROGRAM**

<u>In the Matter of:</u>	:	Appeal of
PPG Industries, Inc.	:	Title V Operating Permit No. 0057-
PPG Industries – Springdale Plant	:	OP18a, Minor Modification to
125 Colfax Street	:	Installation Permit No. 0057-I005C, and
Springdale, PA 15144-1506	:	Installation Permit No. 0057-I011
	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 6th day of February, 2023, that a true and correct copy of the foregoing Motion to Dismiss has been served via electronic mail upon the following:

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