

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **PPG Industries, Inc.**

City: East Point

County: Fulton

AIRS #: 04-13- 0121-0254

Application #: TV-13998

Date SIP Application Received: August 28, 2002

Date Title V Application Received: August 28, 2002

Permit No: 2851-121-0254-V-02-1

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits:

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2851-121-0254-V-02-0	May 22, 2002		✓

Table 2: Comments on Specific Permits

Permit Number	Comments
2851-121-0254-V-02-0	None.

B. Regulatory Status:

1. PSD/NSR/RACT

PPG is a major source for VOCs under NSR. Based on an emission inventory submitted in May of 1986, potential VOC emissions were calculated to be 253.4 tons per year. In April of 1988, PPG was issued a permit for the expansion of its production of oil-based paints. In order to avoid review under NSR regulations the facility was limited to 7.5 million gallons of oil based coatings a year so that VOC emissions from the expansion did not exceed 40 tons per year. In May of 1998, PPG Industries was issued a permit for the addition of a new production line (Source Code D097 or TRIX). After netting, potential VOC emissions increased by approximately 1 ton per year. The increase was below the 25 tons over 5 consecutive calendar years allowed by NSR. Therefore, a VOC emissions increase of 1 ton for 1998 was recorded for netting purposes.

2. Title V Major Source Status by Pollutant:

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification:

The facility is requesting that the permit be modified such that a maximum of 20 parts washer units be allowed by the Title V permit. The permitted parts washers were originally listed, in the insignificant activities list of the facility's original Title V application, as cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent. However, since the facility is in the non-attainment area, the cold cleaners are subject to Georgia Rule (ff) and were moved to Table 3.1.1 of the permit. The number of cold cleaners at the facility has always varied, and the facility has requested the flexibility to continue to both add and remove the cold cleaners as necessary. Although emissions from the cold cleaners are insignificant (20 units operated continuously emit less than 1 ton per year of VOC combined), the facility has agreed to take a limit of 20 units allowed at the facility at any given time.

The modification qualifies as a minor modification without construction because the parts washers are portable units that can be added and removed as a matter of normal operation and the only change required in the permit is the addition of a monitoring condition.

B. PSD/NSR Applicability:

PPG is a major source for VOCs under NSR. In order to avoid review under NSR regulations the facility was limited to 7.5 million gallons of oil based coatings a year so that VOC emissions from the expansion did not exceed 40 tons per year.

In May of 1998, PPG Industries was issued a permit for the addition of a new production line (Source Code D097 or TRIX). After netting, potential VOC emissions increased by approximately 1 ton per year. This increase was below the 25 tons over 5 consecutive calendar years allowed by NSR and a VOC emissions increase of 1 ton for 1998 was recorded for netting purposes.

The additional cold cleaners requested by the facility in this amendment will increase emissions by 0.15 tons per year. This increase is also below the 25 tons over 5 consecutive calendar years allowed by NSR. Therefore, a VOC emissions increase of 0.15 tons for 2004 is recorded in this narrative for netting purposes.

III. Facility Wide Requirements

- A. Emission and Operating Caps: None Applicable.
- B. Applicable Rules and Regulations:
 - Rules and Regulations Assessment – None applicable.
 - Emission and Operating Standards – None applicable.
- C. Compliance Status: No noncompliance issues exist.
- D. Operational Flexibility: None applicable.
- E. Permit Conditions: None.

IV. Regulated Equipment Requirements

- A. Brief Process Description:

The production of oil-based, water-based, and high performance coatings involves the pre-assembly of raw materials, the mixing and grinding of pigments and resins, solvents and additives. Products are batch produced and adjusted by addition or deletion of materials to meet specific client quality requirements. Products are strained and filled into containers for off site sale.

For intermix coatings, neutral, white and colored intermediate base coatings are blended to provided specific industrial coatings. The base coatings are weighed and filtered directly into product containers. They are then agitated, sampled, quality-controlled and shipped.

- B. Additional Emission Units:

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable	Corresponding Permit	ID No.	Description

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		Requirements/Standards	Conditions		
C001	Cold Cleaners (Not to exceed 20)*	391-3-1-.02(2)(ff)	3.4.7, 5.2.3, 5.2.7.	na	na

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

C. Equipment & Rule Applicability:

- Emission and Operating Caps – None Applicable.
- Applicable Rules and Regulations -

Rules and Regulations Assessment – Georgia Rule 3-91-3-1-.02(2)(ff) applies to all degreasers in the non-attainment area. The specific applicable requirements for this facility’s equipment (Process Group C001) are for cold cleaner degreasers.

Emission and Operating Standards – Georgia Rule 3-91-3-1-.02(2)(ff) limits the operation of a cold cleaner degreaser unless the following requirements are satisfied. First, the facility is required to have a cover on the degreasers that should be closed when the degreaser is not in operation. Next, the facility is required to equip the degreaser with a space for draining cleaned parts before removing the parts from the degreaser. Waste solvent should be stored in covered containers and should not be disposed of in a manner that allows excessive evaporation into the atmosphere.

If the degreaser sprays solvent to clean parts, the spray stream must be a solid fluid stream, not a fine mist atomized or shower type spray. It should also be at a pressure that keeps the solvent from splashing.

If the solvent has a volatility of 0.60 psi or more at 100 °F or if the solvent is heated to 120 °F, then the degreaser must be equipped with a freeboard of 0.7 or more, a water cover (the solvent used with this method of control should be insoluble in and heavier than water), or other systems of the same level of control, such as a refrigerated chiller or carbon adsorption.

D. Compliance Status:

No noncompliance issues exist.

E. Operational Flexibility:

The facility requested the flexibility to add and remove the number of cold cleaner degreasers as necessary. Rule applicability is the same whether the facility has one unit on site or twenty units on site. Therefore, the only change made to the permit was the addition of a monitoring condition requiring the Permittee to maintain a record of the number of degreasers located at the facility.

F. Permit Conditions:

A condition was added requiring the Permittee to maintain a record of the number of degreasers located at the facility and to report as an excursion if the number of degreasers exceeded 20 units.

V. Testing Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment: None applicable.
- B. Equipment Groups (all subject to the same test requirements): None applicable.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment: See Equipment Groups
- B. Equipment Groups (all subject to the same monitoring requirements): The facility is required to maintain a record of the number of cold cleaners located at the facility at any given time and is required to report to the Division any time the number of units exceeds 20.

VI. Other Record Keeping and Reporting Requirements

None Applicable.

VII. Specific Requirements

A. Operational Flexibility

The facility requested the flexibility to add and remove the number of cold cleaner degreasers as necessary. Rule applicability is the same whether the facility has one unit on site or twenty units on site. Therefore, the only change made to the permit was the addition of a monitoring condition requiring the Permittee to maintain a record of the number of degreasers located at the facility and to report as an excursion if the number of degreasers exceeded 20 units.

B. Alternative Requirements

There are no alternative requirements indicated as a part of this minor modification.

C. Insignificant Activities

No insignificant activities have been added as part of this minor modification.

D. Temporary Sources

The facility has not requested to operate any temporary sources.

E. Short-Term Activities

The facility did not report any short-term activities.

F. Compliance Schedule/Progress Reports:

Based on all presently available information, no compliance or progress reports are necessary.

G. Emissions Trading:

The facility is not involved in any emissions trading.

H. Acid Rain Requirements

The facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Prevention of Accidental Releases

The facility is not subject to the Accidental Release Prevention Program.

J. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

L. Specific Conditions

None.

Addendum to Narrative

The 45-day EPA review started on April 19, 2004 and ended on May 27, 2004. Comments were not received by the Division.