Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**PPG Industries, Inc.**	**AI #:**	**1255**	**TEMPO Activity No:**	**PER20070008**
Facility Name:	**TE-2 Unit**	**Remarks Submitted by:**	**Debbie Ford, Env. Sci.**		
Permit Writer:	**Scott J. Templet**	**Permit Writer Email address:**	**Scott.Templet@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- *Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.*

Permit Reference	Remarks	Air Permits Division Response (for official use only)
EQT0444 (533C Cooling Tower)	**What is the basis for 2.21 tpy of VOC emissions? If this is a non-contact cooling tower, why are VOCs permitted?**	**The cooling tower VOC emissions were based on AP-42 factors (AP-42 5.1 Table 5.1-2).**
EQT0435 (306 No. 4 OHC Scrubber)	**Why is the max emission rate >3 times the average? (555.15 #/hr, 1884.62 #/hr)**	**This maximum value was given from a more accurate calculation or simulation rather than just an engineering estimate.**
EQT0435 (cont'd)	**Why *is there no performance test for this source?* (There weren't testing requirements in the –V0 permit). The ethylene emissions are 465.48 #/hr avg & 1712.3 #/hr max. Does the scrubber not remove ethylene? What is the scrubbing medium? *Is this correct that it only operates 49 hr/yr but is permitted for* 13.6 tpy VOCs?**	**This source is a scrubber controlling process equipment. This source is not a HON control device; it is a water scrubber used for SSM and GCXVII events. The removal efficiency by species was determined and that *information* was used to provide the current emission limits.**
EQT0434, 435, 436, 442, 443 (various scrubbers)	**The only parameter to monitor is scrubber flow. Is there pH to also monitor?**	**All scrubbers use water as the scrubbing medium. Therefore no requirement to monitor pH is required.**

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EQT0434, 435, 436 (various scrubbers)	Flow is to be monitored on daily basis for some scrubbers & every 15 min. for others. The statistical basis for the minimum flow rate is "daily" for scrubbers monitoring flow every 15 minutes and on a daily basis. Is this correct?	This information correlates to the additional information provided on August 21, 2007.
EQT0442 & 443 (scrubbers)	Flow to be monitored daily & flow rate is to be >0 gal/min, but "none specified" for the statistical basis for the flow rate.	All flow rates should be averaged over a daily period.
	Since the EIQ sheets aren't included with the permit and there is no detailed description in the Briefing Sheet on the unit, where do you indicate what sources are controlled by a scrubber? The tanks that are routed to the incinerators are included in the Inventories section, but the Comments for the scrubbers are blank. Clarification or more detail would help.	All scrubbers control process equipment (not individually identified in permit) except for source 353 (EQT 436) which controls the TCE/tetra tank. However, this tank and scrubber are defined together (combined as one source in TEMPO).

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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**PPG Industries, Inc.**	**AI #:**	**1255**	**TEMPO Activity No:**	**PER20070008**
Facility Name:	**TE-2 Unit (Title V Permit No. 2695-VO)**	**Remarks Submitted by:**	**Don Johnson, Annette Habetz, Steve Miller, Maureen Harbourt (counsel to PPG)**		
Permit Writer:	**Scott J. Templet**	**Permit Writer Email address:**	**Scott.Templet@la.gov**		

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis Section II. Facility and Current Permit Status	**The latest acid rain permit is 2646-IV-1, dated 10-11-06. This should replace the acid rain permit 2649-IV0.**	**Removed reference to acid rain permit 2649-IV0.**
Statement of Basis, Section IV, Streamline Equipment Leak Monitoring Program	**The draft permit states "none" whereas it should state that the program is in effect already.**	**Edited to: See Appendix A of the permit.**
Statement of Basis and Title V Permit, page 3 Section V.	**The correct permit shield citations should be 40 CFR 70.6(f) and LAC 33:III.507.I. In addition, PPG requests that DEQ state in the public notice of the draft permit that a permit shield is included. This statement is required to be in the public notice per LAC 33:III.507.I. PPG wants to ensure that all prior permit shield determinations under this permit be continued with the modification of this permit.**	**Made corrections to citation. Added notification of permit shield to public notice.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Title V Permit, Air Permit Briefing Sheet page 1, Section I. Background	PPG would like for the sentence to read, "This is the Part 70 operating permit for the TE-II Unit".	Made requested change.
Air Permit Briefing Sheet, Section III, Permit Shield	The correct permit shield citations should be 40 CFR 70.6(f) and LAC 33:III.507.I.	Corrected citation.
Air Permit Briefing Sheet, Section III, Permit Shield. Bullet 3.	Change the reference to read: Compliance with 40 CFR 63 Subparts A and H constitutes compliance with 40CFR 60 Subpart VV and 40 CFR 61 Subparts F and V, and LAC33.III.2122 for fugitive emissions in the TE-2 unit as determined in the Streamlined Equipment Leak Monitoring Program.	Made change.
Section VIII. General Conditions XVII Activities	Activities O4, M1,M2,M3,M4,M6,M7,M8,M9 should read that these are "clearing" activities, not cleaning.	Made changes.
Section IX. Insignificant Activities, item 3	Change the Name to "Thermalane Storage"	Made change.
Title V Permit	PPG requests that LDEQ remove the "General Information Table" from the permit . The information is subject to routine changes and should not be considered to be part of the permit. PPG does not object if DEQ moves this section to the Statement of Basis or uses it as an attachment to the Statement of Basis.	The General Information section does have a NOTE at the bottom stating that it is not considered part of the permit. However, in order to stay consistent with LDEQ, this section will remain as is.
Inventory pages and Specific Requirement pages	In the header the title reads "Air-Title V Regular Permit Minor Mod" What does the term "regular" mean?	This designates the permit type as opposed to a Title V General Permit. Title V General permits do not require a PN and are usually used for Oil & Gas facilities.
Emission Point EQT 0438 (356)	PPG requests that this tank be removed from the permit. It has been taken out of service and will not be used in the future. PPG requests that these comments be accepted as the notice of a permanent emission reduction per LAC 33:III.511.	Deleted this source from permit.
Emission Point EQT 0439 (357)	PPG requests that this tank be removed from the permit. It has been taken out of service and will not be used in the future. PPG requests that these comments be accepted as the notice of a permanent emission reduction per LAC 33:III.511.	Deleted this source from permit.
Emission Point EQT 0445 (557)	Throughout the permit, this should read "Stab" in place of "Slab".	Made change.
Emission Rates for Criteria Pollutants table	PPG requests that LDEQ remove average lb/hr VOC limit for FUG0004 .	The Fugitive VOC Average lb/hr will remain in the permit.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for HAPs/TAPs	PPG requests that LDEQ remove maximum hourly limits for HAPs/TAPs for fugitives, tanks, and wastewater (including cooling towers. For TAPs for which there is a state-only short term ambient standard, LDEQ should substitute a 3-hour or 8-hour average limitation and should designate it as state-only. The regulatory requirements applicable under HON adequately control these emissions without the necessity of a maximum hourly emission limit. In some cases, calculation of a maximum hourly requires force-fit usage of tools such as TANKS, which is clearly intended for estimating annual emissions, not short-term rates.	The maximum hourly limits for fugitives, tanks, and wastewater equipment will be removed from the permit.
Specific Requirements	The instant permit action is a modification initiated by PPG's modification request. Only the conditions of the permit relating to the modification request should be changed in this permit. No new requirements not contained in the existing permit that are not related to the modification request should be added. The LDEQ desire to reformat the permit to the TEMPO format does not supersede the regulations concerning permit modification.	For any requested permit modification or renewal, the entire permit is "opened" for review and therefore can be edited or corrected. LDEQ does have the authority to modify, update, clarify or correct any deficiencies in the permit whether or not the modification was requested for that particular part. (See LAC 33:III.529.)
Specific Requirements 46,47,48,49,50,51	These requirements have been completed and the results submitted to LDEQ within the HON Notification of Compliance Status (NOCS). These requirements should therefore be removed or otherwise acknowledged as having been satisfied.	Added note to these requirements.
Specific Requirement 52 and 53	Specific requirements 52 and 53 apply to equipment containing HON Group1 process wastewater. The MC Ash Liquor Tank contains a HON Group 2 process wastewater, as described in PPG's HON NOCS, therefore these requirements do not apply and should be removed.	Removed these requirements.
Specific Requirements 81, 82, 83, 93, 94, 95, 99, 100, 101, 105, 106, 107, 111,112,113, 117, 118, 119, 126, 127, 128, 136, 137, 138	PPG does not transfer process vents as described in 40 CFR 63.113 (i), therefore these requirements do not apply. Please remove these from the permit.	Removed these requirements.
Specific Requirements 80,92,98,104,110,116,124,135	These requirements refer to a compliance option that PPG does not utilize. Please remove these requirements entirely to avoid confusion.	Removed these requirements.
Specific Requirements 147, 148	These tanks store 1,1,1-trichloroethane (methyl chloroform) which is exempt from the control requirements for VOCs per LAC 33.III.2117.	Removed these requirements.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 160,161,162,163,164, 165,166,167,168,169,170	These specific requirements apply to the control device for vinyl chloride emissions. PPG uses incineration for this purpose. Sufficient requirements exist in the Incinerators Area permit (2040-V1) to ensure compliance. The referenced specific requirements should be removed from the permit to avoid duplicative requirements for the same activity and vents. The existing Title V permit for this unit correctly states that PPG should "comply with all applicable provisions of [NESHAP 40 CFR Part 61, Subpart F], except the exhaust gas provisions superseded by 40 CFR 63.110(f). LDEQ should simply continue this existing language as a Specific Requirement.	Removed these requirements. Also added wording from existing Title V permit.
Specific Requirement 172	The requirement is incomplete.	Corrected this requirement.
Specific Requirements 173,174,175,176, 177	PPG requests that these conditions be deleted because they are duplicative of Part 70 General Conditions, and are worded somewhat differently than are the General Conditions, raising the potential for confusion. There is no reason to repeat the General Conditions of the permit as specific requirements. This will prevent the use of updated General Conditions and/or will require more DEQ time and resources to modify the permit when General Conditions are updated. By putting them in 2 places in the same permit, both would require revision when there are updates. Additional information on the inconsistencies in the requirements, and the problems this can cause can be provided if needed. In the alternative, if these conditions are not removed, LDEQ should revise these conditions so the wording is exactly the same as the General Conditions.	Removed these requirements listed. Requirement 177 (40 CFR 82.Subpart F) was removed, but for a different reason; as stated in Table 2 of the permit, this requirement does not apply.
Specific Requirement 185	This condition should be removed. It appears to be an extraneous entry.	Removed this requirement / condition.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements SR 153-158	The existing Title V permit contains a condition in Table 2 that states: "NESHAP Part 61 Subpart Ff – National Emission Standard for Benzene Waste Operation (40 CFR 61.340-61.358) – Shall comply with all applicable provisions of this subpart. Exempt from the requirements of 40 CFR 61.342(b) and (c). " In the Note column it states "Benzene emissions from the Lake Charles Complex are less than 10 Mg/yr). PPG requests that the same permit condition be added to this version of the permit, in lieu of these SRs. This would make it clear that only the "applicable" provisions of Part 61, Subpart FF are included. Further, it should be noted that 40 CFR Part 63, Section 110(e) contains provisions for the HON wastewater provisions to supersede certain requirements of Part 61, Subpart FF. Thus, to the extent that PPG complies with the HON as provided in 63.110(e), those superseded portions of Part 61, Subpart FF would not be "applicable."	These specific requirements have been removed. However, a requirement has been added which states that PPG shall comply with HON wastewater requirements which supersede some requirements of 40 CFR 61 Subpart FF. Also, table 2 (of this permit) does contain the exemption from the requirements of 40 CFR 61.342(b) and (c).
Specific Requirement No. 228	PPG requests that this SR be Removed. PPG has requested that 40 CFR 68 requirements be removed from this permit and placed only in the Complex Support Title V permit which has been issued for the site-wide requirements. The requirements of 40 CFR Part 68 apply on a site-wide basis to the entire PPG stationary source. See 40 CFR 68.1. One registration is required for the stationary source, although it must cover all covered processes. 40 CFR 68.160. The Risk Management Plan required by 40 CFR 68.150 states: "The owner or operator shall submit a single RMP that includes the information required by §§68.155 through 68.185 for all covered processes." Thus, it is clear that the appropriate permit to regulate these site-wide requirements is in the to-be-issued Complex Support Title V permit, not in individual process unit Title V permits, such as this permit for the TE-2 Unit..	To remain consistent with LDEQ practices, this requirement will remain in this permit as a reference that 40 CFR 68 requirements are required plant wide. A note was added which states that the 40 CFR 68 requirements can be found in the Complex Support Title V permit.
	PPG is still reviewing proposed permit revisions and may comment further on these during the public comment period.	

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