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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**PPG Industries, Inc.**	**AI #:**	**1255**	**TEMPO Activity No:**	**PER20080015**
Facility Name:	**Waste Recovery Unit**	**Remarks Submitted by:**	**Don Johnson, PPG Industries, Inc.**		
Permit Writer:	**Qingming Zhang**	**Permit Writer Email address:**	**qingming.zhang@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.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Pages 2-5	The header on pages 2-5 of the Statement of Basis indicate the "Wastewater Unit". Please correct to reflect the "Waste Recovery Unit"	**The header has been corrected as requested.**
Statement of Basis Section II	Please update the Table of permits to reflect the latest issued permits. The following permits have been recently issued as administrative amendments: Derivatives Docks issued July 28, 2009, Mercury Recovery Unit issued January 29, 2008, Derivatives Shipping July 28, 2009, and Power/Utilities August 14, 2009.	**The issuance dates of all permit numbers listed in the Table of Permits are correct. For clarity, issuance dates of the latest Administrative Amendments are added to the table.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Section V, Page 4	The SOB Section V, page 4 states that there is no permit shield requested for this renewal. This is incorrect. Section 9 of the Application for Approval of Emissions includes a request for permit shield (the yes box is checked). Please modify the SOB Section V and include the permit shield in the draft permit.	**The statement has been changed to: "No permit shield is granted." The application requested a permit shield to state that HON Subpart G supersedes NSPS Subparts Kb and NNN and compliance with HON Subpart constitutes compliance with LAC 33:III.Chanpter 21 (2103, 2115, and 2147). Since HON Subpart G already indicates that it supersedes NSPS Subparts Kb and NNN, a permit shield for HON Subpart G superseding NSPS Subparts Kb and NNN is unnecessary. A permit shield to indicate that compliance with HON Subpart G constitutes compliance with LAC 33:III.2115 and 2147 is unnecessary either since Louisiana Regulation Code already indicates that these provisions (2115 and 2147) are not applicable or exempt for a source subject to the requirements of HON Subpart G. LDEQ has determined that a source shall comply with both LAC 33:III.2103 and HON Subpart G if both regulations are applicable. Therefore, no permit shield is granted.**
Draft Permit Cover Letter	Please change the expiration date to reflect the appropriate expiration date for this permit action. This action is a permit renewal which means this permit will not expire until 5 years after the effective date signed, not 2011.	**The permit expiration date (5 years after the effective date signed) will be determined at the time of issuing the permit.**
Section VIII, GC XVII Activities	The permit lists only VOC emissions requested with the proposed activities. PPG requests the non-VOC emissions limits be listed as "Other" emissions as presented in the AAE Section 20.	**As requested, the non-VOC TAP emission rates have been added to the GC XVII Activities list as "Other".**
Section IX, Insignificant Activities	Please correct the units for ISA-A5 Portable Kerosene Heaters to be <1MMBTU/hr rather than <1MMBTU/heater.	**The units for the heat input have been corrected as requested.**
Section IX, Insignificant Activities	Please add temporary portable fuel tanks pursuant to LAC 33.III.501.B.5.A.8. PPG inadvertently omitted this request from the application.	**The temporary portable fuel tanks have been added to the Insignificant Activities list as requested.**
Section IX, Insignificant Activities	Please add temporary portable cooling towers pursuant to LAC 33.III.501.B.5.A. 12. PPG inadvertently omitted this request from the application.	**The temporary portable cooling towers have been added to the Insignificant Activities list as requested.**
Permit Section X, Table 2.	The explanation for UNF011 (Waste Recovery Unit) for Requirement NESHAP FF Emission Standards for Benzene Waste Operations [61.342] states "Exempt – Benzene is not present in any waste stream , which has a flow weighted average water content greater than 10%. This is not technically correct. PPG has calculated a Total Annual Benzene (TAB) of less than 1Mg/yr and is therefore exempt from control requirements. Please update the exempt explanation to reflect the correct information.	**This row has been removed since the Waste Recovery Unit is subject to the recordkeeping and reporting requirements of 40 CFR 61 Subpart FF.**

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Section X Table 1, Table 2 and Specific Requirements	Upon further review, sources EQT 0029 (59B-T-405-South Clarifier Overflow Tank) and ETQ 0030 (59B-T-406, North Clarifier Overflow Tank), have been incorrectly classified in the permit application and therefore in the draft permit. EQT 0029 and EQT 0030 are not regulated as HON Group 1 Wastewater vessels as indicated by specific requirements 16 through 24. EQT 0029 and EQT 0030 operate as surge control vessels consistent with 40 CFR 63, Subpart H, 63.161. However they are exempt from surge control vessel control requirements pursuant to 63.170 and Table 2 due to their size. The vessels have a capacity of ~ 53M^3 which is smaller than the 75 M^3 minimum capacity requiring compliance with the standards of HON surge control vessels. PPG requests LDEQ remove Specific Requirements 16 through 24. PPG also request LDEQ list these vessels with a "3" in Table 1 and update Table 2 to reflect the exemption.	**The regulatory requirements for Vessels 59B-T-405 and 406 have been updated as requested.**
Permit Section X Table 1, Table 2, Specific Requirements.	Table 2 incorrectly exempts EQT 0029 and EQT0030 as being exempt from regulation under LAC33.III.2103 due to not being in VOC service. Please correct Table 1 to show a "1" for applicability to LAC 33.III.2103. Please revise the permit to indicate that source EQT 0029 and EQT0030 are subject to LAC33.III.2103A which requires a submerged fill pipe ***or*** a vapor loss control system. Although both are not required, PPG utilizes both a submerged fill pipe and a vapor loss control system consistent with LAC 33.III.2103E.2. The vapor loss control system vents to the combustion devices (permit 2040-V2) with a control efficiency >90%. PPG recommends adding specific requirements for these sources that are duplicates of SR9 and SR 13 in the draft permit.	**The regulatory requirements for Vessels 59B-T-405 and 406 have been updated as requested.**
Permit Section X, Table 2, Specific Requirements.	Table 2 incorrectly exempts EQT 0029 and EQT0030 as being exempt from regulation under 40 CFR 60.110b (NSPS Subpart Kb) due to not being in VOL service. As stated above, this is not the case. However, EQT 0029 and 0030 are exempt form NSPS Kb consistent with Table 1 due to vessel size. The vessels are ~ 53 M^3 and are therefore less than the minimum size (75 M^3 regulated by NSPS Subpart Kb.	**The regulatory requirements for Vessels 59B-T-405 and 406 have been updated as requested.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements, SR 69	LDEQ references 40 CFR 61.357 for the requirement to submit a report annually. 40 CFR 61.357(c) lists the requirements for facilities with a total annual benzene quantity less than 10Mg/yr but greater than 1Mg/yr. PPG has a facility total annual benzene quantity less than 1Mg/yr. Therefore 40 CFR 61.357(b) applies instead of 40 CFR 61.357(c). 40 CFR 61.357(b) only requires PPG to submit a report whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr or more. Please change SR 69 to reference 40 CFR 61.357(b).	**The requirement has been updated as requested.**

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