# Worksheet for Technical Review of Working Draft of Proposed Permit

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| **Company Name:** | **PPG Industries, Inc.** | **AI #:** | **1255** | **TEMPO Activity No:** | **PER20070021** |
| **Facility Name:** | **LCC – Wastewater Unit** | **Remarks Submitted by:** | **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.

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
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| Statement of Basis, Section II | Please remove the reference to the Mercury Cell as this unit is no longer operational at the facility. Under the first paragraph, first bullet point, please replace "mercury cell" with "membrane." In addition, please revise "Mercury Cell" in the list of permitting units/areas at the top of page 2 and the list of permits to read "Mercury Recovery." | Updated as requested. |
| Air Permit Briefing Sheet, Section I | Please revise the reference from "Mercury Cells" to "Mercury Recovery Unit" in the first paragraph. | Updated as requested. |
| Section X, Table 1 | Source UNF 009 (Wastewater unit) has a "1" for applicability to 40CFR 63 NESHAP under Subpart "A". PPG is concerned that is it unclear that Subpart A requirements only apply to sources that are subject to a specific NESHAP.<br><br>To address this issue, PPG requests LDEQ revise the language of the Specific Requirement 100 to state "All affected sources as defined in 40 CFR Part 63 shall comply with all | PPG's comments will be considered for future TEMPO requirement language changes. |

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| | applicable provisions in 40 CFR 63 Subpart A."<br><br>In the alternative, PPG requests that DEQ insert the following footnote at the end of Table 1 – "* 40 CFR Part 63, Subpart A only applies to affected sources (units/equipment subject to a 40 CFR Part 63 standard) and not to all emission sources at the facility." | |
| Inventories, Page 2 of 5 | Page 2 of 5 appears to duplicate page 1 of this section. Please remove the duplicated information. | The duplicate page is removed. |
| Emission Rates for HAPs/TAPs | PPG requests that LDEQ remove UNF0009 and the corresponding emission limits from the Emission Rates for TAP/HAP & other pollutants. PPG did not request a unit wide emission cap, nor is such an emission cap warranted given that there are TPY emission limits for each point source in the Emission Rate Sheets. Both individual EQT/EIQ limits and unit wide limits are not necessary to comply with any state or federal standard applicable to the Wastewater Unit.<br><br>Please remove the "facility wide" emission totals from the HAP/TAP emission table, or in the alternative, add a footnote to HAP/TAP table to indicate that the "facility wide" totals are for information only. | The updated emission table for TAP/HAP & Other Pollutants has indicated that emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under the permit, but do not constitute an emission cap. |
| Emission Rates | PPG requests LDEQ place a statement in the briefing sheet that all average lb/hr emission rates are on a calendar year basis unless otherwise stated. | The average rates are calculated based on the annual operating hours, which are listed in the "Inventories" report. |
| SR 2, 9, 41, 46, 51, 59, 64, 73, 78, and 88 | PPG requests the word "continuously" be removed and replaced with "at the approved frequency" to accurately reflect the applicable provisions cited in these specific requirements. | The requirement languages have been updated that they do not contain the word "continuously". |
| SR 29 | PPG requests the word "continuously" be removed and replaced with "at the approved frequency". Pursuant to LAC 33:III.1511.D.2, Continuous monitoring is not required for this source because it emits less than 100TPY of SO2. | This is a recordkeeping requirement. The requirement language has been updated that it does not contain the word "continuously". |
| SR 13, 18 | Please remove "by flow rate monitoring device". | PPG's comment will be considered for future TEMPO requirement language changes. |
| SR 14, 19 | Correct misspelling of "onside" to read "onsite." | The typos are corrected. |
| SR 102-105 | PPG requests that the following be added to the end of each of these Specific Requirements: "In the event of a conflict, the General Conditions take precedence over this specific requirement." These SRs are already covered by the General Conditions of the permit, and in some cases, do not accurately restate the requirements of the General Conditions of the permit, thus causing ambiguity in compliance requirements. | PPG's comment will be considered for future TEMPO requirement language changes. |

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| SR101 | It is PPG's understanding that, although the permit references 40 CFR Part 68, compliance with Part 68 will be enforced through PPG's site-wide Complex Support Title V permit. SR 101 indicates that the Wastewater Unit is part of a facility (Lake Charles Complex) that is subject to the requirements for 40 CFR 68. SR 128 states that the unit must comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.<br><br>SR 101 does not clearly state that enforcement of 40 CFR 68 requirements are implemented through the Complex Support Title V permit. PPG requests that DEQ confirm this understanding in the Statement of Basis and revise SR 101 to indicate that compliance requirements for enforcement of 40 CFR 68 requirements are implemented through the Complex Support Title V permit.<br><br>If DEQ disagrees with PPG's understanding, then PPG objects to SR 101. | Complex Support Facilities do not represent the whole Lake Charles Complex. Therefore, Enforcement of 40 CFR 68 requirements Can NOT be implemented through the Complex Support Title V permit only. |
| SR 121 | This specific requirement does not accurately reflect the requirements of LAC 33:III.5109.C based on recent revisions to the rule. The following sentence should be added to the end of SR 121 to reflect the exemption provided in LAC 33:III.5109.C.1 – "These requirements do not apply to emissions of any of those pollutants listed in LAC 33:III.5112, Table 51.3, or to sources complying with applicable federal standards in 40 CFR Part 63." | PPG's comment will be considered for future TEMPO requirement language changes. |
| General Condition T, Part 82 | PPG requests clarification regarding applicability of the requirements under General Condition T. PPG has permitted all refrigeration units under the Complex support permit (2359-VO) and not individual permits.<br><br>PPG requests the addition of a statement in the permit briefing sheet indicating that no refrigeration units subject to 40 CFR 82 covered by this permit and General Condition T is not applicable. | This permit does not include any pollutants regulated under 40 CFR 82 and does not contain any requirement of 40 CFR 82. |
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