



Notice of Appeal

This form is used to file an appeal of an order, notice, decision, determination, or ruling by the Allegheny County Health Department. Please complete this form (use additional pages as necessary). If more than one person or entity is filing this appeal, please attach a separate form for each additional appellant. A copy of the order, notice, decision, determination, or ruling must be attached to the Notice of Appeal.

Name Michael P. Webb

Mailing Address 125 Colfax Street

City Springdale State PA Zip 15144 Email mwebb@PPG.COM

Phone 724-274-3889 Fax (optional) _____

If you are represented by an attorney, please provide contact information for your attorney:

Name _____

Mailing Address _____

City _____ State _____ Zip _____ Email _____

Phone _____ Fax (optional) _____

Describe your objections to the Department's actions and a statement describing the relief you want the Hearing Officer to grant. (The objections may be factual or legal and must be specific. If you fail to state an objection here, you may be barred from raising it later in your appeal. Use additional pages if necessary.)

In a Title V operating permit and Federally enforceable state operating Permit (ACHD Permit No. 0057), the Department made a substantive change to an operating condition as a result of a comment it received during the public comment process. The comment was incorporated into the final permit without notifying the applicant (PPG Industries - Springdale Plant) of the substantive change or providing the applicant an opportunity to discuss the substantive change with the Department. Furthermore, the substantive change - a requirement to meet a minimum 98 percent destruction efficiency for a regenerative thermal oxidizer (RTO) serving PPG's Paint Plant (continued on page 2)

By filing this Notice of Appeal with the Allegheny County Health Department, I hereby certify that the information submitted is true and correct to the best of my information and belief.

Signature _____ Date _____

Appeals should be submitted in person or by mail to:
Allegheny County Health Department
Attention: Hearing Officer
542 4th Avenue
Pittsburgh, PA 15219

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JUN 11 2018



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was made without sufficient regulatory basis and without proper scientific and technological analysis. The underlying regulatory requirements for the Paint Plant RTD allow a minimum 95 percent destruction efficiency.

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Signature Michael P. Webb Date 6-11-2018

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ALLEGHENY COUNTY HEALTH DEPARTMENT
Air Quality Program

SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES
ON THE PROPOSED ISSUANCE OF PPG INDUSTRIES, INC. –
SPRINGDALE PLANT
OPERATION PERMIT NO. 0057

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on January 12, 2018. The public comment period ended on February 13, 2018]

1. **Comment:** The Council appreciates the completeness and clarity in the Department's Technical Support Document.

Response: ACHD appreciates The Council's feedback on the Technical Support Document.

2. **Comment:** The Department should decrease the extremely high emissions Limitation for uncontrolled emissions of hazardous air pollutants, which is not in line with actual emissions from the facility. The emissions limitation for hazardous air pollutants for the entire facility is extremely high -- 153.34 tpy. The emissions limitation for volatile organic compounds is also extremely high – 295.95 tpy. The Department does not identify the individual hazardous air pollutants emitted from the facility, or impose emissions limitations on them individually. But given the nature of this paint manufacturing facility, it is anticipated that the hazardous air pollutants are also volatile organic compounds. It is possible that the facility's emissions limitation of 153.3 tpy was developed when emissions were much higher. It appears that the proposed emissions limitation for hazardous air pollutants was carried over from the existing Title V permit, issued in 2010. Because emissions of hazardous air pollutants have decreased over time, the error might be the continuing assumption that hazardous air pollutants make up approximately 50% of the solvents. Under the circumstances, it is meaningless and underprotective of public health to have such a high emissions limitation as 153.3 tpy for hazardous air pollutants.

Response: The Title V Operating Permit has to account for the maximum potential to emit, which by definition will be higher than the actual emissions at the plant. The emissions limits are based on engineering estimates of maximum emissions from all facility operations and processes.

3. **Comment:** The Department should explore opportunities for reductions of uncontrolled emissions of hazardous air pollutants from P002 (Paint Plant) and P006 (Automated Spray Paint Booth). The bulk of the permitted emissions of hazardous air pollutants are uncontrolled fugitive emissions from process P002. The emissions units that contribute to these emissions include the CP Cell, Light Cell, Dark Cell, and Environ Work Centers, Large Batch Center, and Solvent Still. The Department should consider opportunities for controlling emissions from these units. For example, the facility could adopt a more environmentally-friendly paint formulation, such as water-based, radiation-cured, or high solid content paint formulas. Improving the catchment system to be more robust could significantly reduce fugitive emissions of hazardous air pollutants and volatile organic compounds. For similar reasons, there may be opportunities for emissions reductions in P006. The emissions units that contribute to these emissions include the Automated Paint Spray Booth and the two 50,000 Btu/hr curing/drying ovens. The Department should consider opportunities for controlling emissions from these units, including the use of controls similar to those in process P003, such as filters on the back of the booth, electrostatic

spray guns, and cleaning solution collection. Optimally, a collection hood could be installed that vents to either a condenser or one of the facility's Regenerative Thermal Oxidizers.

Response: The requested changes are made to installation permits, not to operating permits. The purpose of a Title V permit is to memorialize all the legal and technical requirements that apply to a major source under the Clean Air Act. The Title V operating permit incorporates the conditions from previous facility installation permits, and cannot change underlying installation permit conditions for the operation of the facility.

4. **Comment:** The Department should use more recent production rates in its calculations. In addition to carrying over emissions limitations from years in which emissions of hazardous air pollutants were much higher, the Department has relied on production rates that may no longer be representative of facility operations. For the proposed Title V permit, the Department prepared emissions calculations using the same reference year for production (2008) and stack test (2001) as it did for the existing permit. More recent production data are available. The facility is required to report production data on a yearly basis.

Response: See response to comment #3 above. While current stack test and production data are available, the Title V Operating Permit cannot be changed without changing the underlying installation permits. Those installation permits issued since the previous Title V Operating Permit issuance do reflect the most recent data.

5. **Comment:** The Department should substantiate why the regenerative thermal oxidizer (RTO) for the Paint Shop is required to meet only a 95% level of efficiency, rather than a 98% level of efficiency. The facility maintains two regenerative thermal oxidizers (RTOs) with the same capacity (1.6 MMBtu/hr). Both were constructed under Installation Permit 0057-1005 dated May 24, 2007. The Department has imposed two different control efficiencies for these two RTOs. The first RTO is for the Paint Plant. It must be operated at a destruction efficiency of 95%, or meet a volatile organic compound concentration of 20 ppmw. The second RTO is for the Development Plant. It must be operated at a destruction efficiency of 98%. If subpart FFFF applied to the first RTO, it would also be subject to a similar 98% standard. As a technical matter, it does not make sense that two control devices at the same facility, with identical capacities, and constructed under the same installation permit, should be held to two different destruction efficiencies -- 95% and 98%. Presumably, the reason the Department does not require the same destruction efficiency for the first RTO is that it draws a distinction between the manufacture of a chemical (subject to subpart FFFF) and the blending of a coating (subject to subpart HHHHH). While EPA has tried to draw a line between these activities, that line is not altogether clear. At a minimum, the Department should undertake some analysis of this question.

Response: ACHD agrees that both RTOs should operate at a destruction efficiency of 98%. The Paint Plant RTO has been changed to meet a destruction efficiency of 98%. Furthermore, this is now sufficient to meet the 2008 Ozone RACT requirements.

6. **Comment:** The Department should clarify its calculations for Parking Lot and Roadway Emissions, which appear to rely on a higher control efficiency than allowed by reasonably available control measures (RACM). The values set forth by the Department are internally inconsistent. The Department states that a control efficiency of 60% is considered to be RACM. However, it then uses a control efficiency of 65% to calculate the potential particulate matter emissions.

Response: ACHD is using a control efficiency of 65% to calculate the potential particulate matter emissions for Parking Lot and Roadway Emissions. The 60% control efficiency mentioned in the text of the Technical Support Document is a typographical error and has been corrected.

7. **Comment:** Please discuss the applicability of 40 CFR Part 64 (Compliance Assurance Monitoring) for the controls on the Paint Plant Regenerative Thermal Oxidizer (Process P001) and on the Development Center Regenerative Thermal Oxidizer (Process P004).

Response: The Compliance Assurance Monitoring (CAM) rule found in 40 CFR 64 is not applicable to this facility. The Paint Plant is subject to 40 CFR 63 Subpart HHHHH and the Development Center is subject to 40 CFR 63 Subpart FFFF. Both regulations were promulgated after 1990 and are therefore exempt under §64.2.b.1.i.

Bernadette Lipari, Air Quality Engineer
May 10, 2018

List of Commenters

Name	Affiliation
Joseph Otis Minott, Esq.	Clean Air Council
Christopher D. Ahlers, Esq.	Clean Air Council
Mary Cate Opila, P.E., Ph.D.	EPA Region 3

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
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 #0057-1003, VI.1.a; IP #0057-1005b, 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]
- 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]
- 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 #0057-1003, VI.1.b; IP #0057-1005b, V.A.1.b]
 - 1) A minimum VOC destruction efficiency of 98% by weight; or
 - 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 95 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. [§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 #0057-1005b, V.A.1.c]
- 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]