

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

PPG Industries, Inc.)	PLAN APPROVAL ORDER
125 Colfax Street)	AND AGREEMENT No. 254
Springdale, PA 15144)	<u>UPON CONSENT</u>
Allegheny County		

AND NOW, this 19th day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the PPG Industries, Inc., (hereafter referred to as "PPG"), 125 Colfax Street, Allegheny County, Springdale, PA 15144, as the operator and the owner of a resin and paint manufacturing facility at 125 Colfax Street, Allegheny County, Springdale, PA 15144 (hereafter referred to as "the facility"), is a major stationary source of volatile organic compounds (hereafter referred to as "VOCs") emissions as defined in Section 2101.20 of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control (hereafter referred to as "Article XXI"); and

WHEREAS, the Department has determined that Section 2105.06 of Article XXI, entitled "Major Sources of Nitrogen Oxides & VOCs" is applicable to PPG's operations; and

WHEREAS, PPG has been in full compliance at all relevant times with all relevant requirements of Section 2105.06 of Article XXI; and

WHEREAS, PPG has timely submitted to the Department all of the documents required by Section 2105.06.b of Article XXI (hereafter collectively referred to as "the Proposal"); and

WHEREAS, the Department has determined, after review, that the Proposal is complete; and

WHEREAS, the Department has further determined, after review, that the Proposal, constitutes Reasonably Available Control Technology (hereafter referred to as "RACT") for control of VOC emissions from the facility; and

WHEREAS, the Department and PPG desire to memorialize the details of the Proposal by entry of this RACT Plan Approval Order and Agreement Upon Consent; and

WHEREAS, pursuant to Section 2109.03 of Article XXI, the Director of the Allegheny County Health Department or his designated representative may issue such orders as are necessary to aid in the enforcement of the provisions of Article XXI, notwithstanding the absence of any violation of any provision of Article XXI and of any condition causing, contributing to, or creating danger of air pollution;

NOW, THEREFORE, this day first written above, the Department, pursuant to Section 2109.03 of Article XXI, and upon agreement of the parties as hereinafter set forth, hereby issues the following RACT Plan Approval Order and Agreement upon Consent.

I. ORDER

RESIN PLANT

- 1.1. PPG shall not operate the Resin Plant at any time while generating VOC emissions unless the facility's REECO Thermal Oxidizer is in service and all associated emission control systems are operating as required below, with the exception of required maintenance and or repairs of the subject thermal oxidizer.
- 1.2. The thermal oxidizer shall be properly maintained and operated at all times, with instrumentation to continuously monitor and record the incinerator temperature, with one of the three alternative requirements being met and maintained:
 - a. Minimum VOC destruction efficiency of 95% by weight; or
 - b. Maximum outlet concentration of 20 ppm VOC by volume(dry basis);or

c. Minimum incineration temperature of 1500°F

- 1.3. The thermal oxidizer destruction efficiency shall be determined every five years according to EPA approved test methods and Section §2108.02 of Article XXI.
- 1.4. All reactor vessels shall be equipped with condenser units at all times.
- 1.5. The following Resin process systems shall be vented to the thermal oxidizer unit at all times when generating VOC emissions;
 - a. Four reactor condenser vents(K-6,K-7,K-8 & K-9)
 - b. Five raw material weigh tanks
 - c. Four manual ejectors
 - d. Five mixers-resin thindown tanks
 - e. Seven blenders
- 1.6. Revent systems shall be provided for the following processes.
 - a. Molten raw material storage tanks
 - b. Molten raw material weigh tanks
 - c. Mixer unit during product dropping
 - d. Finished product tankwagon loading

- 1.7. Dispensing systems shall not be used unless they are of closed design or minimize free-fall of liquids.
- 1.8. All process and control equipment shall be properly operated and maintained according to good engineering and air pollution control practices at all times.
- 1.9. Process equipment cleaning shall be conducted to minimize VOC emissions.
- 1.10. Floor cleaning operations shall employ waterbased cleaners. The use of solvents will be limited to spot cleaning.
- 1.11. Records shall be kept by the facility to demonstrate compliance with the requirements of Section §2105.06 of Article XXI and Order No. 254. Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements of this Section are met. All data and information required to determine compliance shall be recorded and maintained by the facility as required by Section 2105.06 of Article XXI and Order No. 254. Such records shall include, but not be limited to the following;
- a. REECO Thermal Oxidizer destruction efficiency tests.

b. Daily records of REECO Thermal Oxidizer operating temperatures.

- 1.12. All records shall be retained by the facility for at least five years and shall be made available to the Department upon request as required by §Section 2105.06.g.3 of Article XXI.

PAINT PLANT

- 1.13 PPG shall not allow process operations involving VOC's at the facility to operate unless all stationary mixers are equipped with covers which completely enclose the mixer openings, except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such covers shall either extend at least one-half inch (1/2") beyond the outer rim of the vessel or be attached to the rim.
- 1.14. At no time shall PPG allow any stationary mixer operations at the facility unless all covers are closed at all times except when production, sampling, maintenance or inspection procedures otherwise requires access.
- 1.15. Portable and stationary vessels shall not be used at the facility to process products containing VOC's unless the covers are maintained in

good condition, such that when in place, they maintain contact with their respective rims for at least ninety percent (90 %) of the circumference of the rim.

- 1.16. Dispensing systems shall not be used unless they are of closed design or minimize free-fall of liquids.
- 1.17. Filling of solvent borne coatings shall be not be ^{er} performed unless they are in a closed system.
- 1.18. All grinding mills shall be of completely closed design at all times.
- 1.19. All process and control equipment shall be properly operated and maintained according to good engineering and air pollution control practices at all times.
- 1.20. Process equipment cleaning shall be conducted to minimize VOC emissions.
- 1.21. Floor cleaning operations shall employ waterbase cleaners. The use of solvents will be limited to spot cleaning.
- 1.22. Records shall be kept by the facility to demonstrate compliance with the requirements of Section §2105.06 of Article XXI and Order No. 254.

Such records shall provide sufficient data and calculations to clearly demonstrate that all requirements of this Section are met. All data and information required to determine compliance shall be recorded and maintained by the facility as required by Section 2105.06 of Article XXI and Order No. 254. Such records shall include, but not be limited to the following;

- a. Records of specific solvents and quantities used.
- b. Records of paint production rates by number of batches and quantity of paint produced in each batch.

- 1.23. All records shall be retained by the facility for at least five years and shall be made available to the Department upon request as required by §Section 2105.06.g.3 of Article XXI.

II. AGREEMENT

The foregoing Plan Approval Order shall be enforced in accordance with and is subject to the following agreement of the parties, to wit:

- 2.1. The contents of this Order shall be submitted to the U.S. EPA as a revision to Allegheny County's portion of the Commonwealth of Pennsylvania's State Implementation Plan, (hereafter referred to as "SIP").
- 2.2. Failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject PPG to civil proceedings, including injunctive relief, by the Department.
- 2.3. This Order does not, in any way, preclude, limit or otherwise affect any other remedies available to the

Bureau for violations of this Order or of Article XXI, including, but not limited to, actions to require the installation of additional pollution control equipment and the implementation of additional corrective operating practices.

2.4. PPG hereby consents to the foregoing Order and hereby knowingly waives all rights to appeal said Order, and the undersigned represents that he is authorized to consent to the Order and to enter into the RACT Plan Approval Order and Agreement Upon Consent on behalf of PPG.

~~2.5. PPG acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of VOCs from this facility. PPG further acknowledges and understands the possibility that the U.S. EPA may decide to not accept the Agreement portion of this RACT Plan Approval Order~~

~~and Agreement by Consent as a revision to the
Commonwealth of Pennsylvania's SIP. In the event
that the said Agreement portion is not approved and
accepted by the U.S. EPA, the Agreement shall be
amended as necessary to conform with the
Agreement reached by the U.S. EPA, the Department
and PPG.~~

IN WITNESS WHEREOF, and intending to be legally bound,
the parties hereby consent to all of the terms and conditions of the
foregoing Plan Order and Agreement as of the date of the above
written.

PPG INDUSTRIES, INC

By: C F Wallace

(signature)

Print or type Name: Charles F. Wallace

Title: Plant Manager

Date: 12-11-96

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: Bruce W. Dixon 12/19/96

Bruce W. Dixon, M.D., Director
Allegheny County Health Department

and By: Thomas J. Puzniak

Thomas J. Puzniak, Engineering Manager
Air Quality Program