

**ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM**

June 26, 2023

SUBJECT: Reasonable Available Control Technology (RACT III) Determination
PPG Industries, Inc. – Springdale Facility (PPG)
125 Colfax Street
Springdale, PA 15144-1506
Allegheny County

Title V Operating Permit No. 0057

TO: JoAnn Truchan, P.E.
Program Manager, Engineering

FROM: Bernadette Lipari
Air Quality Engineer

I. Executive Summary

The PPG Industries – Springdale facility is defined as a major source of VOC emissions and was subjected to a Reasonable Achievable Control Technology III (RACT III) review by the Allegheny County Health Department (ACHD) required for the 2015 Ozone National Ambient Air Quality Standard (NAAQS). The findings of the review established that the PPG Industries – Springdale facility is subject to both presumptive RACT III and case-by case RACT III requirements and the requirements are summarized below.

Table 1 Technically and Financially Feasible Control Options Summary for VOC

Unit ID	Emissions Unit	Financially Feasible Control Option	Current VOC PTE	RACT Reduction	Revised VOC PTE	Annualized Control Cost (\$/yr)	Cost Effectiveness (\$/ton VOC removed)
There are no additional technically and financially feasible control options available for VOC reduction from RACT II to RACT III.							

These findings are based on the following documents:

- RACT analysis performed by PPG Industries, Inc. – Springdale Facility (2022-12-21 RACT III.pdf) – Submitted on December 22, 2022
- RACT II permit No.0057-PO18a, issued February 28, 2020 (EPA approval on September 21, 2022, 86 FR 57612)

II. Regulatory Basis

On October 26, 2015, the US EPA revised the ozone NAAQS. To meet the new standards, ACHD requested all major sources of NO_x (potential emissions of 100 tons per year or greater) and all major sources of VOC (potential emissions of 50 tons per year or greater) to reevaluate NO_x and/or VOC RACT for incorporation into Allegheny County’s portion of the PA SIP. ACHD has also incorporated by reference 25 Pa. Code, §§129.111-115 under Article XXI, §2105.08 (“RACT III”).

This document is the result of ACHD's determination of RACT submitted by the subject source and supplemented with additional information as needed by ACHD. The provisions of RACT III will replace those of the previous RACT I and RACT II.

As part of the RACT regulations codified in 25 Pa. Code §§ 129.111—129.115 (relating to additional RACT requirements for major sources of NO_x and VOCs for the 2015 ozone NAAQS) (RACT III), ACHD has adopted the Pennsylvania Department of Environmental Protection's established method under § 129.114(i) (relating to alternative RACT proposal and petition for alternative compliance schedule) for an applicant to demonstrate that the alternative RACT compliance requirements incorporated under § 129.99 (relating to alternative RACT proposal and petition for alternative compliance schedule) (RACT II) for a source that commenced operation on or before October 24, 2016, and which remain in force in the applicable operating permit continue to be RACT under RACT III as long as no modifications or changes were made to the source after October 24, 2016. The date of October 24, 2016 is the date specified in § 129.99(i)(1) by which written RACT proposals to address the 1997 and 2008 8-hour ozone National Ambient Air Quality Standard (NAAQS) were due to the Department from the owner or operator of an air contamination source located at a major NO_x emitting facility or a major VOC emitting facility subject to § 129.96(a) or (b) (relating to applicability).

The procedures to demonstrate that RACT II is RACT III are specified in § 129.114(i)(1)(i), 129.114(i)(1)(ii) and 129.114(i)(2), that is, subsection (i), paragraphs (1) and (2). An applicant may submit an analysis, certified by the responsible official, that the RACT II permit requirements remain RACT for RACT III by following the procedures established under subsection (i), paragraphs (1) and (2).

Paragraph (1) establishes cost effectiveness thresholds of \$7,500 per ton of NO_x emissions reduced and \$12,000 per ton of VOC emissions reduced as "screening level values" to determine the amount of analysis and due diligence that the applicant shall perform if there is no new pollutant specific air cleaning device, air pollution control technology or technique available at the time of submittal of the analysis. Paragraph (1) has two subparagraphs.

Subparagraph (i) under paragraph (1) specifies that the applicant that evaluates and determines that there is no new pollutant specific air cleaning device, air pollution control technology or technique available at the time of submittal of the analysis and that each technically feasible air cleaning device, air pollution control technology or technique evaluated for the alternative RACT requirement or RACT emission limitation approved by the Department (or appropriate approved local air pollution control agency) under § 129.99(e) had a cost effectiveness equal to or greater than \$7,500 per ton of NO_x emissions reduced or \$12,000 per ton of VOC emissions reduced shall include the following information in the analysis:

- A statement that explains how the owner or operator determined that there is no new pollutant specific air cleaning device, air pollution control technology or technique available.
- A list of the technically feasible air cleaning devices, air pollution control technologies or techniques previously evaluated under RACT II.
- A summary of the economic feasibility analysis performed for each technically feasible air cleaning device, air pollution control technology or technique in the previous bullet and the cost effectiveness of each technically feasible air cleaning device, air pollution control technology or technique as submitted previously under RACT II.
- A statement that an evaluation of each economic feasibility analysis summarized in the previous bullet demonstrates that the cost effectiveness remains equal to or greater than \$7,500 per ton of NO_x emissions reduced or \$12,000 per ton of VOC emissions reduced.

Subparagraph (ii) under paragraph (1) specifies that the applicant that evaluates and determines that there is no new pollutant specific air cleaning device, air pollution control technology or technique available at the time of submittal of the analysis and that each technically feasible air cleaning device, air pollution control technology or technique evaluated for the alternative RACT requirement or RACT emission limitation approved by the Department (or appropriate approved local air pollution control agency) under § 129.99(e) had a cost effectiveness less than \$7,500 per ton of NO_x emissions reduced or \$12,000 per ton of VOC emissions reduced shall include the following information in the analysis:

- A statement that explains how the owner or operator determined that there is no new pollutant specific air cleaning device, air pollution control technology or technique available.
- A list of the technically feasible air cleaning devices, air pollution control technologies or techniques previously evaluated under RACT II.
- A summary of the economic feasibility analysis performed for each technically feasible air cleaning device, air pollution control technology or technique in the previous bullet and the cost effectiveness of each technically feasible air cleaning device, air pollution control technology or technique as submitted previously under RACT II.
- A statement that an evaluation of each economic feasibility analysis summarized in the previous bullet demonstrates that the cost effectiveness remains less than \$7,500 per ton of NO_x emissions reduced or \$12,000 per ton of VOC emissions reduced.
- A new economic feasibility analysis for each technically feasible air cleaning device, air pollution control technology or technique.

Paragraph (2) establishes the procedures that the applicant that evaluates and determines that there is a new or upgraded pollutant specific air cleaning device, air pollution control technology or technique available at the time of submittal of the analysis shall:

- Perform a technical feasibility analysis and an economic feasibility analysis in accordance with § 129.92(b) (relating to RACT proposal requirements).
- Submit that analysis to the Department (or appropriate approved local air pollution control agency) for review and approval.

The applicant shall also provide additional information requested by the Department (or appropriate approved local air pollution control agency) that may be necessary for the evaluation of the analysis submitted under § 129.114(i).

III. Facility Description

PPG Industries, Inc. – Springdale Plant is a paint manufacturing plant and research & development facility. The paint plant produces coatings for aluminum extrusions, general industrial, and coil coating. Within the main paint manufacturing buildings is housed a series of technical laboratories providing testing and customer support for PPG Coatings. The paint manufacturing building also houses manufacturing support laboratories, which oversee the quality and other parameters of products, manufactured. The research and development plant provides scale-up support for resin manufacture and tests new resins used in coatings. The last full compliance evaluation (FCE) at PPG Industries was conducted on August 26, 2021 and the facility was found to be in compliance. The facility currently has no violations.

There were no modifications or changes made to the facility after October 24, 2016. There have been no changes to this facility since the RACT II permit No. 0057-OP18a was issued on February 28, 2020.

PPG Industries is a major source of VOC emissions. The facility does not emit 100 tons per year or greater of NO_x and is thus not a major source for NO_x emissions.

Table 2 is a list of sources subject to § 129.114(i). The RACT II determination assures compliance with RACT III requirements:

Table 2 Facility Sources Subject to Case-by-Case RACT III

Source ID	Description	Rating	VOC PTE (TPY)	VOC Case-by-Case Limit (RACT II)	VOC Presumptive Limit (RACT III)	VOC Case-by-Case Limit (RACT III)	RACT II as RACT III
P001	Paint Plant – Controlled	1.6 MMBtu/hr	10.42	Increase the efficiency from 95% to 98%	NA	No change from RACT II requirements (129.114(i)(1)(i))	Y
P002	Paint Plant – Uncontrolled (incl. fugitives)	17,868,000 lb solvent/yr	238	Overspray Filters; LDAR	NA	No change from RACT II requirements (129.114(i)(2))	Y
P003	Paint Plant Freightliner Spray Booth	39,420 lb coating /yr	2.50	Good Engineering Practice; Electrostatic Spray Gun	< 2.7 tpy (129.112(c)(2)); Good Engineering Practice; Electrostatic Spray Gun	NA	NA
P004	Development Center – Controlled	1.6 MMBtu/hr	3.70	Good Engineering Practice	NA	No change from RACT II requirements (129.114(i)(1)(i))	Y
P005	Development Center – Uncontrolled (Connectors-gas)	NA	3.63	Overspray Filters; LDAR	NA	No change from RACT II requirements (129.114(i)(1)(i))	Y
P006	Development Center Automated Spray Booth	5,000 gal/yr	6.96	Good Engineering Practice; Rotary Bell Applicator; CTG \$2105.83	NA	No change from RACT II requirements (129.114(i)(1)(i))	Y

Table 3 Facility Sources Exempt from RACT III per PA Code 129.111

Source ID	Description	Rating	VOC PTE (TPY)
B001	Paint Plant Boiler 1a	25.1 MMBtu/hr	0.44
B002	Paint Plant Boiler 2	25.1 MMBtu/hr	0.44
B003	Paint Plant Warehouse Boiler	8.4 MMBtu/hr	0.15
	Paint Plant Storage Tanks	2,645,400 gal/yr	2.14*
	Paint Plant Environ, Trix cleaners, and Large Batch Ctr.	84,400 gallons (0.78 lb/hr)	0.26
	Development Center Storage Tanks	584,000 gal/yr	0.69
P005	Development Center Uncontrolled (Valves)	n/a	0.498
P005	Development Center Uncontrolled (Pump Seals)	n/a	0.109
P005	Development Center Uncontrolled (PRV)	n/a	0.012
P005	Development Center Uncontrolled (Connectors-liq.)	n/a	0.330
P005	Development Center Uncontrolled (Agitator Seals)	n/a	0.396
P005	Development Center Uncontrolled (Small Side Reactor)	n/a	0.690
	Miscellaneous Spray Booths	n/a	Negligible

* Individual units are < 1 TPY

IV. RACT III Determination

Paint Plant RTO (P001)

P001 is currently controlled using a capture and control system with an RTO that is required to meet 98% reduction or better. In the previous permit issuance, the Paint Plant RTO (P001) was considered BACT at 95% destruction

efficiency. However, subsequent stack testing on 9/26/07, 4/14/10, 10/8/13, and 10/3/18 (see RACT II¹) revealed that it was achieving a 98% destruction efficiency at no additional cost.

Therefore, ACHD determined that RACT II for the controlled emissions from the Paint Plant was continued control with the existing RTO meeting a destruction efficiency of 98% instead of 95%. This limited VOC emissions to 10.4 tpy. (P001) is currently subject to RACT I and RACT II requirements and to the requirements for existing affected sources under the Miscellaneous Coatings Manufacturing NESHAP and are included in the current Title V permit. Since process (P001) commenced operation before October 24, 2016, has not been modified, and is subject to RACT II requirements under 25 Pa Code § 129.99 (e), which satisfy § 129.114 (c), this source meets the requirements for § 129.114 (i). PPG's analysis under the requirements of § 129.114 (i)(1)(i) showed that there were no new technically feasible control devices or methods for this process. Therefore, RACT III for process (P001) shall be continued compliance with the requirements listed above and contained in the current Title V operating permit.

Uncontrolled VOC emissions from the Paint Plant (P002)

Uncontrolled VOC emissions from the Paint Plant (P002) occur during material additions from loose-fitting lids and equipment leaks, product sampling, product filling/packaging, and during equipment cleaning. Uncontrolled VOC emissions from the Paint Plant (P002) are limited to 54.3 lbs/hr and 238.0 tons per year. Although the fugitive VOC emissions from (P002) are large, these emissions cannot be vented to a common stack because of the number of individual sources, that combined, create large VOC emissions. Ducting each of these sources is not technically feasible. With the type of venting described above, the technically feasible options for limiting VOC emissions under RACT II are described below.

According to information available in EPA's *Control of VOC Emissions from Ink and Paint Manufacturing Processes*², and *Control Techniques for Volatile Compound Emissions from Stationary Sources*³, VOC emissions from the Paint Plant (P001) can be controlled with:

- (a) Equipment or Process Modifications
 1. Tank Lids
 2. Modified Milling Equipment
 3. Storage Tank Conservation Vents
- (b) Equipment Cleaning
 1. Rubber Wipers
 2. High Pressure Spray Heads
 3. Teflon-lined Tanks
 4. Plastic Pigs
 5. Automatic Tub Washers
- (c) Improved Operating Practices
 1. Dedicated Process Lines/Equipment
 2. Use of Covers During Tank Operation
 3. Splash/Spill Prevention
 4. Closed Container Storage of Wastes
 5. Employee Awareness

¹ RACT II permit No.0057-PO18a (Feb. 28, 2020).

² US EPA, "Control of VOC Emissions from Ink and Paint Manufacturing Processes", EPA-450/3-92-013, April 1992. Available at: http://www.epa.gov/ttn/catc/dir1/ink_paint.pdf

³ US EPA, "EPA's Control Techniques for Volatile Compound Emissions from Stationary Sources", EPA 453/R-92-018, December 1992. Available at: <http://www.epa.gov/ozonepollution/SIPToolkit/ctgs.html>

- (d) Recycling Techniques
 1. Re-use Solvent in Subsequent Batches
 2. Countercurrent Rinsing
- (e) Product Reformulation
 1. Low VOC Coatings
 2. Powder Coatings
 3. Waterborne Paints
 4. Radiation-Curable Paints
 5. High-Solids Paint
- (f) Leak Detection and Repair Program (LDAR)

Product reformulation to produce low-VOC or water-based coatings is technologically feasible, but the mandated production or phase-in of reformulated products is technologically infeasible. The coatings manufactured at PPG are largely dictated by the customers' needs.

All of these technologies except for product reformulation, are technically feasible options for controlling fugitive VOC from the Paint Plant. However, all of these options are required by the current Title V operating permit from RACT I Order #254, RACT II, or as work practice standards of Subpart HHHHH so no further review was necessary.

Since this source has VOC emissions greater than 2.7 tons per year, (P002) did not meet presumptive RACT under RACT II and does not meet presumptive RACT III requirements. (P002) also does not meet the qualifications in 25 Pa Code § 129.114 (i)(1)(i) because another control option was identified. (P002) is therefore subject to § 129.114 (i)(2).

Although no new control options were identified as part of RACT II, PPG identified a new upgrade available to one currently employed technology that can be considered a new control option. A case-by-case RACT analysis was conducted for VOC emissions for (P002). See Section V below for an analysis on this available option.

The Freightliner Spray Booth (P003)

The Freightliner Spray Booth (P003) consists of surface coating and clean-up operations. Coatings are applied to metal and plastic panels with electrostatic guns in a spray booth. Solvent is used for clean-up. RACT II VOC emissions were lowered from 8.27 tons per year in the previous permit issuance to 2.5 tons per year. This was based on the average VOC emissions of 0.069 tons per year over a nine year period of emissions inventory data. VOC emissions are uncontrolled.

ACHD determined for RACT II that requiring the installation of a thermal incinerator to control VOC emissions from the Freightliner Spray Booth RACT II was not cost-effective (See Table 4 below). The RACT II permit included a federally enforceable SIP limit of 2.5 tons per year, which makes this process exempt under RACT III.

Since (P003) meets the presumptive RACT requirements set forth in 25 Pa. Code § 129.112 (c)(2), the owner/operator shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices. Therefore, RACT III for the control of VOC emissions from the Freightliner Spray Booth shall be to continue to comply with the current permit requirements.

Developmental Center RTO (P004)

The VOC emissions from the Developmental Center RTO are limited in the current Title V operating permit to 0.846 pound per hour and 3.703 tons per year. The Development Center RTO is subject to 40 CFR 63, Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, which requires the RTO to achieve 98% destruction of VOC. The operating permit also requires the RTO to achieve 98% destruction of VOC. A stack test of the Development Center RTO conducted on November 26, 2013 indicated

that the VOC destruction efficiency of this control device is 98.8%. ACHD determined that 98% was the greatest reduction achievable and was considered RACT II for (P004). Therefore, the RACT II for those units that are controlled with the RTO was continued control and compliance with 40 CFR Part 63, Subpart FFFF and permit conditions.

Since process (P004) commenced operation before October 24, 2016, has not been modified, and is subject to RACT II requirements under 25 Pa Code § 129.99 (e), which satisfy § 129.114 (c), this source meets the requirements for § 129.114 (i). PPG's analysis under the requirements of § 129.114 (i)(1)(i) showed that there were no new technically feasible control devices or methods for this process. Therefore, RACT III for process (P004) shall be continued compliance with RACT I and RACT II requirements and 40 CFR Part 63, Subpart FFFF contained in the current Title V operating permit.

Uncontrolled emissions from the Development Center (P005)

These emissions are subject to the requirements of 40 CFR Part 63, Subpart UU – National Emission Standards for Equipment Leaks – Control Level 2 for equipment leaks in all equipment in organic HAP service. Subpart UU requires that the source use a Leak Detection and Repair (LDAR) program to identify and repair leaks from this equipment. The requirements of this rule are some of the most stringent and ACHD considers the LDAR system to be achieving the greatest reduction and is therefore considered RACT II for (P005). Other good operating practices are required, including operating and maintaining the Development Center in accordance with the manufacturer's specifications, equipping each portable process vessel with a cover or lid that must be in place at all times, not operating or allowing to be operated any dispensing or filling systems for solvents unless they are of closed design or minimize free-fall of liquids, cleaning all process equipment so as to minimize VOC emissions, employing water-based cleaners in any floor cleaning operations, and limiting the use of solvents to spot cleaning. RACT II for these fugitive emissions was determined to be continued compliance with Subpart UU and good engineering practices.

Since process (P005) commenced operation before October 24, 2016, has not been modified, and is subject to RACT II requirements under 25 Pa Code § 129.99 (e), which satisfy § 129.114 (c), this source meets the requirements for § 129.114 (i). PPG's analysis under the requirements of § 129.114 (i)(1)(i) showed that there were no new technically feasible control devices or methods for this process. Therefore, RACT III for process (P005) shall be continued compliance with RACT I and RACT II requirements and 40 CFR Part 63, Subpart UU contained in the current Title V operating permit.

Wastewater Handling System (P004 & P005)

VOC emissions from wastewater handling are covered under P004 and P005.

Developmental Center Automated Spray Booth (P006)

As stated in the Correspondence dated 07/12/2016 for the BACT analysis in the application for Permit No. 0057-I009 dated 10/07/2015, the only technically feasible control option for the Automated Spray Booth is thermal oxidation. Ducting to one of the existing thermal oxidizers is cost-prohibitive. Furthermore, in the case of the Paint Plant RTO, there is not enough capacity for the additional flow. An analysis of cost for a new thermal oxidizer was estimated using the method outlined in Section 3.2, Chapter 2 of the OAQPS Cost Control Manual. Based on this methodology, installing a new thermal oxidizer is cost-prohibitive. BACT in this case is proper operation and maintenance. The RACT II analysis of (P006) resulted in application of Article XXI §2105.83 Table 1 limitations. RACT II VOC emissions were lowered from 14.92 to 6.96 tons per year of VOC. This calculation was based on changing the maximum VOC content in the topcoat from 6.00 lb_{VOC} per gallon of coating to 2.80 lb_{VOC} per gallon of coating and in the primer from 6.14 lb_{VOC} per gallon of coating to 2.80 lb_{VOC} per gallon of coating. Emissions inventory of the Automated Spray Booth showed that the highest VOC emissions was 3.84 tons per year since installation, so this limit should not pose restrictions to the operation of the booth.

Since process (P006) commenced operation before October 24, 2016, has not been modified, and is subject to RACT II requirements under 25 Pa Code § 129.99 (e), which satisfy § 129.114 (c), this source meets the requirements for § 129.114 (i). PPG’s analysis under the requirements of § 129.114 (i)(1)(i) showed that there were no new technically feasible control devices or methods for this process. Therefore, RACT III for process P006 shall be continued compliance with RACT I and RACT II requirements contained in the current Title V operating permit.

The Technically Feasible Control Options for PPG are detailed in Table 4 below.

Table 4 RACT II Technically Feasible VOC Control Cost Comparisons

Control Option	Process	VOC Emissions Before the Control	VOC Emissions After the Control		Cost *
Thermal Incineration	P003	8.27	0.37	tpy VOC Removed	7.9
				Cost	\$228,500
				\$/ton	\$28,900

* RACT II Technical Support Document; ppgs – ract tvrva (Feb. 28, 2020)

V. RACT III New Technology

PPG currently controls VOC emissions from equipment leaks using a sensory LDAR program for the Paint Plant (P002). Process (P002) is subject to the requirements of 40 CFR Part 63, Subpart HHHHH – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing (the “MCM NESHAP”) and is treated as part of an existing affected source under this regulation. The MCM NESHAP requires that each portable process vessel be equipped with a cover or lid that must be in place when the vessel contains a hazardous air pollutant (HAP), except for material additions or sampling. The MCM NESHAP also requires a Leak Detection and Repair (LDAR) program.

This is the program established by EPA as MACT in the initial MCM NESHAP. In that rulemaking in 2003, EPA identified an instrumental LDAR program as a technically feasible and potentially more effective control technique, evaluated the costs of such a program and the possible incremental reductions in emissions, and determined that the instrumental program was insufficiently cost effective to be justifiable as MACT for this source category.⁴ In 2020, EPA performed the statutorily mandated technology review for the MCM NESHAP.⁵ EPA again evaluated an instrumental LDAR program as a potentially more effective control technique, determined it is not cost effective, and reaffirmed the sensory LDAR program as MACT.⁶

Therefore, RACT III for control of VOC emissions from the Paint Plant (P002) shall be continued compliance with the current permit requirements contained in RACT I Order 254, RACT II, and in Subpart HHHHH requirements.

Table 5 RACT III Technically Feasible VOC Control Cost Comparisons

Control Option	Process	VOC Emissions Before the Control	VOC Emissions After the Control ⁶		Cost
Instrumental LDAR Program	P002	238	NA	Cost	NA
				\$/ton	\$37,000 ^{6,7}

⁷ EPA calculated the cost effectiveness of instrumental LDAR to be \$54,000 per ton of organic HAP emission reduction, on average for the facilities covered by the MCM NESHAP technology review (Docket No. EPA-HQ-OAR-2018-0747, Aug. 21, 2019 at Table 6.11). The value of \$37,000 was obtained by the facility after escalating EPA’s data to current dollars and adjusting for the HAP:VOC ratio, which assumes a HAP:VOC ratio of 50% and uses the Chemical Engineering Plant Cost Index values of 603.1 for December 2018 and 829.8 for July 2022.

⁴ 68 Fed. Reg. 69163, 69178 (Dec. 11, 2003).

⁵ 85 Fed. Reg. 49724 (Aug. 14, 2020).

⁶ 85 Fed. Reg. 49724 (Aug. 14, 2020) at 49732.

VI. RACT II as RACT III

The conditions listed in Table 7 in Section VII of this document below supersede the relevant conditions of Plan Approval Order and Agreement #254 (RACT I), issued December 19, 1996. The RACT III conditions are at least as stringent as those from RACT II. Other RACT I conditions listed in Table 7 below not affected by RACT III remain in effect.

Application of RACT III requirements did not result in any emissions reduction. Application of RACT II conditions reduced VOC emissions by 15.62 tons per year. The total RACT II VOC emissions were 280.31 tons per year and are the same for RACT III.

Table 6 RACT II as RACT III Summary

Unit ID	New source or change to existing source?	Pollutant	RACT II PTE (tpy)	RACT III PTE (tpy)	RACT II VOC	RACT III VOC	RACT III Same as RACT II?
P001	No	VOC	10.42	10.42	cbc	cbc	Y
P002	No	VOC	238	238	cbc	cbc	Y
P003	No	VOC	2.50	2.50	cbc	P	NA
P004	No	VOC	3.70	3.70	cbc	cbc	Y
P005	No	VOC	3.63 (incl. in 5.67)	3.63 (incl. in 5.67)	cbc	cbc	Y
P006	No	VOC	6.96	6.96	cbc	cbc	Y
PP Storage tanks	No	VOC	2.14	2.14	NA	NA	NA
Dev Ctr Storage tanks	No	VOC	0.687	0.687	NA	NA	NA
PP Make UP Air Units	No	VOC	0.28	0.28	NA	NA	NA
Dev Ctr Make Up Air Units	No	VOC	0.14	0.14	NA	NA	NA
TOTAL		VOC	280.31	280.31			

VII. RACT III Summary and Revised RACT III Permit Conditions

The Department has analyzed the facility’s proposal for considering RACT II requirements as RACT III and also performed an independent analysis. Based on the information provided by the facility and independently verified by the Department, ACHD has determined that the RACT II requirements satisfy the RACT III requirements. The RACT III requirements are identical to the RACT II requirements and are as stringent as RACT II.

Table 7 RACT I, RACT II, and RACT III Summary

Unit ID	Permit Condition No.	RACT I Requirement	RACT II Requirement	RACT III Requirement
Paint Plant P001	(V.A.1.b)	Order #254 1.13, 1.14	§129.99	§129.114(i)(1)(i)

Unit ID	Permit Condition No.	RACT I Requirement	RACT II Requirement	RACT III Requirement
Paint Plant P001	(V.A.1.c)	Order #254 1.16, 1.17	\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.1.d.1)		\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.1.f)		\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.1.h)	Order #254 1.20	\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.1.i)	Order #254 1.18	\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.2.a)		\$129.100	§129.115
Paint Plant P001	(V.A.2.d)		\$129.100	§129.115
Paint Plant P001	(V.A.3.b)		\$129.100	§129.115
Paint Plant P001	(V.A.4.a)	Order #254 1.22	\$129.100	§129.115
Paint Plant P001	(V.A.4.c)		\$129.100	§129.115
Paint Plant P001	(V.A.4.j)	Order #254 1.23	\$129.100	§129.115
Paint Plant P001	(V.A.6.a)	Order #254 1.19	\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.6.b)	Order #254 1.19	\$129.99	§129.114(i)(1)(i)
Paint Plant P001	(V.A.6.c)		\$129.99	§129.114(i)(1)(i)
Paint Plant P002	(V.B.1.b)	Order #254 1.15	\$129.99	§129.114(i)(2)
Paint Plant P002	(V.B.1.c)	Order #254 1.16, 1.17	\$129.99	§129.114(i)(2)
Paint Plant P002	(V.B.1.d)	Order #254 1.20	\$129.99	§129.114(i)(2)
Paint Plant P002	(V.B.1.e)	Order #254 1.21	\$129.99	§129.114(i)(2)
Paint Plant P002	(V.B.3.a)		\$129.99	§129.114(i)(2)
Paint Plant P002	(V.B.4.b)		\$129.100	§129.115
Paint Plant P002	(V.B.4.d)	Order #254 1.23	\$129.100	§129.115
Paint Plant P002	(V.B.5.b)		\$129.100	§129.115
Paint Plant P002	(V.B.6.a)	Order #254 1.19	\$129.99	§129.114(i)(2)
Paint Plant P002	(V.B.6.b)	Order #254 1.19	\$129.99	§129.114(i)(2)
Paint Plant P003	(V.C.1.b)		\$129.97	§129.112(c)(2)
Paint Plant P003	(V.C.1.c)		\$129.97	§129.112(c)(2)

Unit ID	Permit Condition No.	RACT I Requirement	RACT II Requirement	RACT III Requirement
P003				
Paint Plant P003	(V.C.1.d)		§129.97	§129.112(c)(2)
Paint Plant P003	(V.C.6.a)		§129.97	§129.112(c)(2)
Paint Plant P003	(V.C.6.b)		§129.97	§129.112(c)(2)
Paint Plant P003	(V.C.6.c)		§129.97	§129.112(c)(2)
Paint Plant P003	(V.C.6.d)		§129.97	§129.112(c)(2)
Paint Plant P003	(V.C.6.e)		§129.97	§129.112(c)(2)
Paint Plant P003	(V.C.6.f)		§129.97	§129.112(c)(2)
Development Center P004	(V.D.1.b.1)		§129.99	§129.114(i)(1)(i)
Development Center P004	(V.D.2.a)		§129.100	§129.115
Development Center P004	(V.D.2.b)		§129.100	§129.115
Development Center P004	(V.D.3.b)		§129.100	§129.115
Development Center P004	(V.D.4.a)		§129.100	§129.115
Development Center P004	(V.D.6.a)	Order #254 1.19	§129.99	§129.114(i)(1)(i)
Development Center P004	(V.D.6.b)	Order #254 1.19	§129.99	§129.114(i)(1)(i)
Development Center P004	(V.D.6.c)		§129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.1.a)		§129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.1.c)		§129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.1.d)		§129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.3.b.1-2)		§129.99	§129.114(i)(1)(i)

Unit ID	Permit Condition No.	RACT I Requirement	RACT II Requirement	RACT III Requirement
Development Center P005	(V.E.3.c)		\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.4.a)		\$129.100	§129.115
Development Center P005	(V.E.4.b.1-5)		\$129.100	§129.115
Development Center P005	(V.E.4.c)		\$129.100	§129.115
Development Center P005	(V.E.4.d)		\$129.100	§129.115
Development Center P005	(V.E.5.b.1-7)		\$129.100	§129.115
Development Center P005	(V.E.6.a)	Order #254 1.19	\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.6.b)	Order #254 1.19	\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.6.c)		\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.6.d)		\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.6.e)		\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.6.f)		\$129.99	§129.114(i)(1)(i)
Development Center P005	(V.E.6.g)		\$129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.1.d)		\$129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.1.e)		\$129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.6.a)		\$129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.6.b)		\$129.99	§129.114(i)(1)(i)

Unit ID	Permit Condition No.	RACT I Requirement	RACT II Requirement	RACT III Requirement
Development Center P006	(V.F.6.c)		§129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.6.d)		§129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.6.e)		§129.99	§129.114(i)(1)(i)
Development Center P006	(V.F.6.f)		§129.99	§129.114(i)(1)(i)
Paint Plant Boilers B001 & B002	(VI.A.1.f)		§129.96(c)	§129.111(c)
Paint Plant Boiler B003	(VI.B.1.f)		§129.96(c)	§129.111(c)
Paint Plant Storage Tanks	(VI.D.1.b)		§129.96(c)	§129.111(c)
Dev. Ctr Storage Tanks	(VI.E.1.b)		§129.96(c)	§129.111(c)
Make-Up Air Units	(VI.F.1.c)		§129.96(c)	§129.111(c)
Make-Up Air Units	(VI.F.1.d)		§129.96(c)	§129.111(c)

Table 8 RACT III Summary

The following conditions were cited for compliance with presumptive RACT (25 Pa. Code, §129.112):

TVOP #0057	
V.C.1.b-d	V.C.6.a-f

The following conditions were cited for case-by-case RACT (25 Pa. Code, §129.114 (i)):

TVOP #0057	
V.A.1.b-d.1, f, h,	V.D.6.a-c
V.A.6.a-c	V.E.1.a, c, d
V.B.1.b-e	V.E.3.b-c
V.B.3.a	V.E.6.a-g
V.B.6.a-b	V.F.1.d-e
V.D.1.b.1	V.F.6.a-f

The following conditions were cited for compliance with case-by-case RACT (25 Pa. Code, §129.115):

TVOP #0057	
V.A.2.a, d	V.D.2.a-b
V.A.3.b	V.D.3.b
V.A.4.c, j	V.D.4.a
V.B.4.b, d	V.E.4.a-d
V.B.5.b	V.E.5.b