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Michael P. Webb, CSP
EHS Manager

July 29, 2020

Via Online Submission

Policy Office
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: *Proposed State Implementation Plan Revision; Certification of the Commonwealth's Submittal of All Case-By-Case Reasonably Available Control Technology Determinations and Averaging Plans to the United States Environmental Protection Agency for the 1997 and 2008 8-Hour Ozone, 50 Pa.B. 3172 (June 27, 2020)*

Dear Sir or Madam:

On behalf of PPG Industries, Inc., I am writing to comment on the Department's above-referenced proposed action as it applies to PPG's Springdale Plant. Along with the above-referenced *Pennsylvania Bulletin* notice, the Department has published Table 1, listing case-by-case Reasonably Available Control Technology ("RACT") II determinations the Department plans to include in a request to revise Pennsylvania's State Implementation Plan ("SIP"). For PPG's Springdale Plant, Table 1 lists Title V Operating Permit No. 0057-OP18A, issued on February 28, 2020 by the Allegheny County Health Department ("ACHD").

Any proposed SIP revision that the Department sends to the U.S. Environmental Protection ("EPA") on behalf of ACHD must inform EPA that PPG's timely appeal of Title V Operating Permit No. 0057-OP18A challenging, among other things, provisions that implicate RACT II, is pending before ACHD's Hearing Officer. The Department and/or ACHD should not ask EPA to revise the SIP to include any case-by-case RACT II determinations in Title V Operating Permit No. 0057-OP18a until PPG's pending appeal is resolved and any amendment or revision to Title V Operating Permit No. 0057-OP18a resulting from the appeal is finalized. The SIP should not be revised prematurely while PPG's appeal of Title V Operating Permit No. 0057-OP18a is pending.

PPG appreciates the opportunity to submit these comments and respectfully requests that you address these comments before submitting the proposed SIP revision to EPA.

Sincerely,

Michael P. Webb, CSP
EHS Manager
Springdale Plant

A handwritten signature in black ink that reads "Michael P. Webb". The signature is written in a cursive style with a large, looping initial "M".

cc: Shawn Mendt, PPG
Aaron Signarovitz, PPG