



PPG Industries, Inc.

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May 25, 2007

Pennsylvania Department of Environmental Protection
Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

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400 Market Street
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Harrisburg, PA 17101-2301

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAY 29 PM 4:30

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Re: Comments of PPG Industries, Inc on PADEP's Proposed Amendments to Chapter 127 (relating to construction, modification, reactivation and operation of sources)
March 24, 2007 Proposed Rule (31 Pa.B. 1317)

Dear Sirs:

PPG Industries, Inc. ("PPG") appreciates the opportunity to provide comments on the proposed amendments to 25 PA. Code Chapter 127, as published in the Pennsylvania Bulletin on March 24, 2007. PPG, headquartered in Pittsburgh, PA, is a major producer of chemicals, coatings, and glass products with a number of industrial facilities located in Pennsylvania. In addition, many of PPG's customers have operations in Pennsylvania.

PPG would like to express its general support for the proposed amendments to Chapter 127. These revisions, with the incorporation of our recommended changes, will provide some additional operational flexibility to industry and will help ensure the timeliness of permit application processing.

PPG respectfully submits the following specific comments on the proposed rule:

1. PPG strongly supports the proposed revisions to Section 127.12b, which will increase to 180 days (from 120) the additional allowed time-extension for shakedown/temporary operation of newly-permitted sources. This will provide facilities with additional flexibility in the event that there are unforeseen problems with newly installed equipment or sources; or if the new/modified sources are not

operating initially as designed and/or permitted.

2. PPG generally supports the proposed addition of Section 127.12d as a means to formalize the permit application review process.

However, PPG recommends that a deadline for the Department to make the completeness determination be specified in the regulation. Specifying a timeframe by which the Department must issue the completeness determination will ensure that plan approval application processing times are kept to a minimum.

For example, the Texas Commission on Environmental Quality (TCEQ), at 30 TAC 116.114(a)(1) [Subchapter B, New Source Review Permits], specifies:

"The executive director shall mail written notification informing the applicant that the application is complete or that it is deficient within 90 days of receipt of the application for a new permit, or amendment to a permit or special permit.

(A) If the application is deficient, the notification must state:

(i) the additional information required; and

(ii) the intent of the executive director to void the application if the information for a complete application is not submitted."

The TCEQ completeness review is for both administrative and technical completeness of the application. Since the completeness review proposed in 127.12d is for administrative completeness only, PPG recommends that a 30-day deadline for the Department to issue their completeness determination be adopted into the final rule language.

3. PPG supports the proposed revisions to Sections 127.44, 127.45, and 127.48.

If you have any questions or would like additional information, please call me at 412-492-5597 or e-mail me at: emcmeekin@ppg.com.

Sincerely,

Elizabeth H. McMeekin, P.E.
Environmental Affairs, Air Programs
PPG Industries, Inc.