

/August 20, 2002/

(AR-18J)

Donald Sutton, Manager
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permits Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Dear Mr. Sutton:

This letter is in reply to your letter dated April 26, 2002, requesting guidance on the applicability of Federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, with regard to PPG Industries, in Mt. Zion, Illinois (Facility ID 115810AAA). Specifically, you asked whether replacing refractory brick (rebricking) constitutes routine maintenance, repair and replacement under PSD.

Based upon the information contained in your letter (attached), discussions with your staff, and the letter from PPG to you (attached), we currently do not have sufficient information to provide guidance to you on whether or not PPG's proposed project would qualify as routine maintenance, repair and replacement for PSD purposes. Although we cannot provide a definitive response at this time, we would like to refer you to certain resources that are helpful in evaluating whether a project is routine or not, and to express our desire to continue working with you and your staff on this issue in the event the source wishes to proceed with the project as proposed.

I would like to draw your attention to the following documents which provide insight into how the U.S. Environmental Protection Agency (U.S. EPA) evaluates a project to determine if it is routine in nature:

- U.S. EPA Region 5 letter, dated May 23, 2000, regarding Detroit Edison, located in the State of Michigan. The letter is available on our Region 5 website at: <http://www.epa.gov/region5/air/permits/permits.htm>, under the link, Letters and Memos.

- U.S. EPA's Environmental Appeals Board (EAB) September 15, 2000 Final Order On Reconsideration, regarding Tennessee Valley Authority. The EAB's order can be found at: <http://www.epa.gov/eab>.
- U.S. EPA Region 9 letter dated October 12, 2000, regarding Owens Brockway (attached).

I hope you will find this information useful, and look forward to working with you further on this determination. Follow-up questions and concerns can be directed to me, or John Kelly of my staff, at (312) 886-4882.

Sincerely yours,

/s/

Pamela Blakley, Chief
Permits and Grants Section

Attachments