



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

May 31, 2012

REPLY TO THE ATTENTION OF:

LR-8J

7001 0320 0005 8933 1235

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

Travis Cobb, PE, Environmental Associate
PPG Industries, Incorporation
4829 Fairland Road
Barberton, Ohio 44203

Re: Draft Federal RCRA Permit, PPG Industries, Incorporation
Barberton, Ohio, OHD 004 198 917

Dear Mr. Cobb:

Enclosed is the draft federal Resource Conservation and Recovery Act (RCRA) permit for PPG Industries, Incorporation, Barberton, Ohio.

The draft federal RCRA permit will be publicly noticed in the "Barberton Herald" and "WNIR" radio station on May 31, 2012. A copy of the draft federal RCRA permit is available for review at the Barberton Public Library, 602 West Park Avenue, Barberton, Ohio 44203. The public comment period extends from May 31 to July 17, 2012.

During the public comment period, you or any interested party may submit comments to the U.S. Environmental Protection Agency on the draft federal RCRA permit. At the close of the comment period, EPA will prepare a response to all significant comments. Comments on the draft federal RCRA permit may be submitted to:

U.S. Environmental Protection Agency, Region 5
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

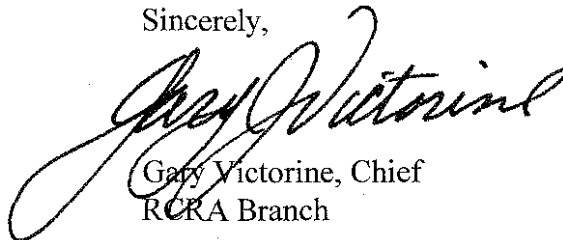
Attention: Jae B. Lee

You may request that EPA hold a public hearing about this permit. At a hearing, you will have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the permit with EPA staff. If a public hearing is to be held, EPA will make a separate announcement of the date, time, and location of that hearing/meeting, thirty (30) days in advance.

Following review of any comments received on the draft federal RCRA permit, EPA will issue a final permit decision in accordance with the requirements of 40 CFR § 124.19.

If you have questions concerning the draft federal RCRA permit, please contact Jae Lee, of my staff, at (312) 886-3781.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Victorine". The signature is written in a cursive style with a large, looping initial "G".

Gary Victorine, Chief
RCRA Branch

Enclosure

cc: Jeremy Carroll, OEPA

DRAFT

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: **PPG Industries, Inc.**
4829 Fairland Road
Barberton, Ohio 44203

Owner: **PPG Industries, Inc.**
One PPG Place
Pittsburgh, PA 15272

Operator: **PPG Industries, Inc.**
One PPG Place
Pittsburgh, PA 15272

EPA Identification Number: **OHD 004 198 917**

Effective Date: **30 Days from Issuance Date of the Final Permit**

Expiration Date: **September 24, 2020**

Authorized Activities:

The U. S. Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the “permit”) to PPG Industries, Inc. (hereinafter referred to as the “Permittee” or addressed in the second person as “you”) in connection with your hazardous waste management operations at your facility in Barberton, Ohio.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 U.S.C. § 6901 *et seq.*) (collectively referred to as “RCRA”) and EPA’s regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 CFR)).

Specifically, this permit addresses air emission standards for equipment leaks and containers. See 40 CFR Part 264, Subpart BB and CC.

The RCRA permit consists of both this permit, which contains the effective federal RCRA permit conditions issued by EPA, and the effective State RCRA permit conditions issued by the State of Ohio's RCRA program authorized under 40 CFR Part 271 (hereinafter called the "State RCRA permit").

The State RCRA permit was issued on September 24, 2010. (The effective and expiration dates of the State RCRA permit are September 24, 2010 and September 24, 2020, respectively.) Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

Permit Approval:

On June 28, 1989, the State of Ohio received final authorization to administer the pre-HSWA RCRA hazardous waste program in accordance with Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271. The State of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since that time.

However, because EPA has not yet authorized the State of Ohio to administer certain RCRA regulations promulgated under HSWA, including the air emission standards for equipment leaks (40 CFR Part 264 Subpart BB) and the air emission standards for containers (40 CFR Part 264 Subpart CC), EPA Region 5 is issuing the RCRA permit requirements for operations at your facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, the documents attached hereto, all documents cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 CFR Parts 124, 260, 261, 262, 264, 270, and applicable provisions of RCRA.

This permit is based on the assumption that 1) the information submitted in your RCRA Part B Permit Application on November 22, 2010, including the Part A Application, and all other modifications to that application (hereinafter referred to as the "Part B Permit Application"), and 2) the supplemental information for Subpart AA, BB, and CC, dated April 15, 2011, is accurate, and the facility is configured, operated and maintained as specified in the Part B Permit Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 CFR §§ 270.41, 270.42 and 270.43, and for enforcement action. You must inform EPA of any deviation from, or changes in, the information in the Part B Permit Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

Opportunity to Appeal:

Petitions for review must be submitted within 30 days after EPA serves notice of the final permit decision. Any person who files comments on the draft permit or participates in the public hearing may later petition the Environmental Appeals Board to review any condition of the permit decision. Any person who fails to file comments or fails to participate in the public hearing on the draft permit may file a petition for review, but only to contest changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 CFR § 124.19.

Effective Date:

This permit is effective as of **(30 Days from Issuance Date of the Final Permit)** and will remain in effect until **(September 24, 2020)**, unless revoked and reissued under 40 CFR § 270.41, terminated under 40 CFR § 270.43, or continued in accordance with 40 CFR § 270.51(a).

By: _____ Date: _____
Margaret M. Guerriero
Director
Land and Chemicals Division

**OHD 004 198 917
PPG Industries, Inc.**

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

You are hereby allowed to manage hazardous waste at the PPG Industries, Inc. (facility) in accordance with this permit. Under this permit, your storage of RCRA hazardous waste must be in compliance with all terms and conditions in this permit. Other aspects of your treatment of RCRA hazardous wastes are subject to the conditions in the state-issued portion of the RCRA permit.

Subject to 40 CFR § 270.4, compliance with the RCRA permit during its term constitutes compliance for purposes of enforcement with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under 40 CFR Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 CFR Part 264 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of the same; or (4) promulgated under subparts AA, BB, or CC of 40 CFR Part 265 limiting air emissions. (40 CFR §§ 270.4)

This permit does not: (1) convey any property rights or any exclusive privilege (40 CFR § 270.30(g)); (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC §§ 9601 *et seq.* (commonly known as CERCLA); or (3) any other law protecting human health, welfare, or the environment.

I.B PERMIT ACTIONS

I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 CFR §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 CFR § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on your part will not stay the applicability or enforceability of any permit condition. (40 CFR § 270.30(f))

You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective. You may perform construction associated with a Class 2 permit modification request beginning 60 days after submission of the request, unless the Director establishes a later date. (40 CFR § 270.42(b)(8)) (Pursuant to Chapter 8-6 of the Region 5 Delegation Manual, the authority assigned to the Regional Administrator as Director under 40 CFR § 270.42(b)(8) has been delegated to the Division Director of the Land and Chemicals Division of the EPA, Region 5. Thus, for the purposes of this permit, the term Director shall refer to the Division Director of the Land and Chemicals Division.)

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 CFR § 270.30(b) and Condition I.E.2 of this permit. In reviewing any application for a permit renewal, the EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 CFR § 270.30(b) and RCRA Section 3005(c)(3))

I.C SEVERABILITY

This permit's provisions are severable; if any permit provision, or the application of any permit provision to any circumstance is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidation of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 CFR § 124.16(a))

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 CFR Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where neither the regulations nor the permit define a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

I.E DUTIES AND REQUIREMENTS

1.E.1 Duty to Comply

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 CFR § 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit

termination; revocation and reissuance; modification; or denial of a permit renewal application. (40 CFR § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue the permit regulated activities after the expiration date, you must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 days before the permit expiration date, unless the Director grants permission for a later submittal date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 CFR §§ 270.10(h) and 270.30(b))

I.E.3 Permit Expiration

Unless revoked or terminated, this permit and all conditions herein will be effective until the permit expiration date of September 24, 2020. This permit and all conditions herein will remain in effect beyond the permit's expiration date if you have submitted a timely, complete application (40 CFR § 270.10 and §§ 270.13 through 270.29), and, through no fault of your own, the Director has not made a final determination regarding permit reissuance. (40 CFR §§ 270.50 and 270.51)

I.E.4 Need to Halt or Reduce Activity Not a Defense

In an enforcement action, you are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 CFR § 270.30(c))

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, you must take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 CFR § 270.30(d))

I.E.6 Proper Operation and Maintenance

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that you install or use to comply with this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires you to operate back-up or auxiliary facilities or similar systems only when necessary to comply with this permit. (40 CFR § 270.30(e))

I.E.7 Duty to Provide Information

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires. The information you must maintain under this permit is not subject to the Paperwork Reduction Act of 1980, 44 USC §§ 3501 *et seq.* (40 CFR §§ 264.74(a) and 270.30(h))

I.E.8 Inspection and Entry

Upon the presentation of credentials and other legally required documents, you must allow the Director or an authorized representative to (40 CFR § 270.30(i)):

I.E.8.a Enter at reasonable times upon your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

I.E.8.b Have access to and copy, at reasonable times, any records that you must keep under the conditions of this permit;

I.E.8.c Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.E.8.d Sample or monitor any substances at any location at reasonable times, to ensure permit compliance or as RCRA otherwise authorizes.

Notwithstanding any provision of this permit, EPA retains the inspection and access authority which it has under RCRA and other applicable laws.

I.E.9 Monitoring and Records

I.E.9.a Samples and measurements taken for monitoring purposes must be representative of the monitored activity. The methods used to obtain a representative sample of the wastes, contaminated media, treatment residue, or other waste to be analyzed must be the appropriate methods from Appendix I of 40 CFR Part 261, or the methods specified in the State-approved waste analysis plan, or an equivalent method approved by the Director. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and*

Wastes (EPA 600/4-79-020), or an equivalent method, as specified in the referenced waste analysis plan. (40 CFR § 270.30(j)(1))

I.E.9.b You must retain, at the facility, all records as specified in 40 CFR § 264.74.

I.E.9.c You must submit all monitoring results at the intervals specified in this permit.

I.E.9.d You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. The 3-year period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. (40 CFR §§ 270.30(j) and 270.31))

I.E.10 Reporting Planned Changes

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 CFR § 270.30(l)(1))

I.E.11 Reporting Anticipated Noncompliance

You must notify the Director, in advance, of any planned changes in the permitted facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 CFR § 270.30(l)(2))

I.E.12 Certification of Construction

Subject to the requirements of 40 CFR §§ 270.32(b)(2) and 270.42 Appendix I, you must not operate any RCRA air emission control devices completed after the effective date of this permit until you have submitted to the Director, by certified mail or hand-delivery, a letter signed both by your authorized representative and by a registered professional engineer. That letter must state that the portions of the facility covered by this permit (including all air emission control devices required by this permit) have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either:

I.E.12.a The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

I.E.12.b The Director waives inspection and you may commence treatment, storage, or disposal of hazardous waste in accordance with 40 CFR § 270.30(l)(2)(ii)(B).

I.E.13 Transfer of Permits

This permit is not transferable to any person, except after notice to the Director. You must inform the Director and obtain prior approval of the Director before transferring ownership or operational control of the facility (40 CFR § 270.42, Appendix I). Under 40 CFR § 270.40, the Director may require permit modification, or revocation and reissuance to change your name and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the Director and obtain prior approval and notify the new owner or operator in writing of the requirements of this permit and the requirements of 40 CFR Parts 264, 268, and 270. (40 CFR §§ 264.12(c), 270.30(l)(3), and 270.40(a))

I.E.14 Twenty-Four Hour Reporting

I.E.14.a You must report to the Director any noncompliance with this permit that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after you become aware of the noncompliance.

I.E.14.b Your report must include any information concerning: (1) the release of any hazardous waste that may endanger public drinking water supplies; (2) the release or discharge of hazardous waste; or (3) fire or explosion from the hazardous waste management facility, that could threaten the environment or human health outside the facility. In addition, you must provide a description of the occurrence and its cause that includes the following information (40 CFR § 270.30(l)(6)):

- (1) Name, title and telephone number of the person making the report;
- (2) Name, address and telephone number of the facility;
- (3) Name, address and telephone number of owner or operator;
- (4) Date, time and type of incident;
- (5) Location and cause of incident;
- (6) Identification and quantity of material(s) involved;

- (7) Extent of injuries, if any;
- (8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (9) Description of any emergency action taken to minimize the threat to human health and the environment; and
- (10) Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.14.c In addition to the oral notification required under Conditions I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5 calendar days after you become aware of the circumstances. The written report must include, but is not limited to, the following:

- (1) Name, address and telephone number of the person reporting;
- (2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;
- (4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and
- (5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue, and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5 calendar days; however, you will then be required to submit a written report within 15 calendar days of the day on which you must provide oral notice, in accordance with Conditions I.E.14.a and I.E.14.b of this permit. (40 CFR § 270.30(1)(6))

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Condition I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Condition I.E.14. (40 CFR § 270.30(l)(10))

I.E.16 Other Information

I.E.16.a Whenever you become aware that you failed to submit or otherwise omitted any relevant facts in the permit application or other submittal, or submitted incorrect information in the permit application or other submittal, you must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal. (40 CFR § 270.30(l)(11))

I.E.16.b All other requirements contained in 40 CFR § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all of those requirements.

I.F SIGNATORY REQUIREMENT

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 CFR § 270.11. (40 CFR § 270.30(k))

I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be submitted to the Director should be sent by certified mail or hand-delivered to the U.S. Environmental Protection Agency, Region 5, at the following address:

RCRA Branch, LR-8J
Land and Chemicals Division
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

I.H CONFIDENTIAL INFORMATION

In accordance with 40 CFR Part 2, Subpart B, you may claim any information this permit requires, or is otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions, or, in the case of other submittals, by stamping the words "Confidential Business Information" on each page containing such information. If you made no claim at the time of submittal, the Director may make the information available to the public without further notice. If you assert a claim, the information will be treated in accordance with the procedures in 40 CFR Part 2. (40 CFR § 270.12)

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and all amendments, revisions, and modifications to them:

I.I.1 Operating Record

You must maintain in the facility's operating record the documents required by this permit, and by the applicable portions of 40 CFR §§ 264.1064, 264.1088, 264.1089 and 40 CFR § 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

You must maintain notifications from generators accompanying initial incoming shipment of wastes subject to 40 CFR Part 268 Subpart C, that specify treatment standards, as required by 40 CFR §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit at the facility, including all the documents listed in any attachments, and you must update it as necessary to incorporate any official permit modifications.

I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

I.J.1 All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to an enforcement

action under Section 3008 of RCRA. This action may include fines, or permit suspension or revocation.

I.J.2 This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in 40 CFR Parts 124, 260, 261, 262, 264, 268, 270, and the applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from any approved designs, plans or schedules is a permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

I.J.4 If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Condition I.B of this permit.

I.J.5 If any documents attached to this permit are found to conflict with any of the Conditions in this permit, the Condition will take precedence.

I.K COORDINATION WITH THE CLEAN AIR ACT

You must fully comply with the RCRA requirements contained in this permit. This permit does not include the requirements imposed by the Clean Air Act.

SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS (40 CFR PART 264 SUBPART BB)

40 CFR § 264.1050(b) specifies that the 40 CFR Part 264 Subpart BB regulations apply to equipment (as defined in 40 CFR § 264.1031) that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight. Your Part B application and subsequent Subparts BB and CC information submittal indicate that all but one of the hazardous waste streams with an organic concentration more than 10 percent by weight do not contain or contact the equipment located at the site. There is one hazardous waste stream, described as the reactor washout/isopropyl alcohol washout (“IPOH Washout”), with an organic concentration more than 10 percent by weight which is contacted with facility equipment. However, your Part B application and subsequent Subparts BB and CC information submittal indicates that the IPOH Washout waste stream is transferred out of the process equipment into a tote less than 300 hours per calendar year. Therefore, per 40 CFR § 264.1050(f), based on this condition, the equipment which contacts this waste stream is excluded from the requirements of 40 CFR § 264.1052 through § 264.1060 to the degree that you identify the equipment as required under 40 CFR § 264.1064(g)(6).

Specifically, you must identify the equipment that contains or contacts the IPOH Washout waste stream. Such identification must be specified in the "Subpart BB Compliance" log. In addition, you must enter in this log the total hours, per calendar year basis, which the identified equipment contacts or contains with the IPOH Washout waste stream. You must retain the "Subpart BB Compliance" log at the facility, and must provide the log to the EPA representatives, or its designees, upon request.

Your Subparts BB and CC information submittal, dated April 15, 2011, also states that fugitive emissions from the IPOH Washout waste stream are directed to a caustic scrubber. The caustic scrubber is primarily used to control fugitive emissions from the facility's production processes and the fugitive emissions from the transfer of the IPOH Washout waste stream on a periodic basis. However, you state in your Subparts BB and CC information submittal that the control device (caustic scrubber) will be operated in accordance with 40 CFR Part 63, Subpart FFFF and 40 CFR Part 63, Subpart NNNNN.

Therefore, according to 40 CFR § 264.1064(m), you can demonstrate the compliance with the requirements specified in 40 CFR 264 Subparts BB and CC by documentation of compliance with the regulations at 40 CFR Part 63. You must document your compliance with 40 CFR Part 63 for the control device. You must retain the compliance documentation at the facility and must provide such documentation to the EPA representatives, or their designees, upon request.

You must inform the EPA, RCRA program, in writing, about any changes of the certification or the compliance status of the subjected equipment with the 40 CFR Part 63 regulations.

SECTION III -- AIR EMISSION STANDARDS FOR CONTAINERS (40 CFR PART 264 SUBPART CC)

Hazardous waste is stored in containers in the permitted storage area located at the Hazardous Waste Storage Building (HWSB). Wastes are stored mostly in 55-gallon (0.21 cubic meter (m³)) drums and 275-gallon totes.

You must comply with all applicable requirements of 40 CFR § 264.1080 through 40 CFR § 264.1090, regarding air emission standards for containers handling hazardous waste. All containers not exempt from 40 CFR Part 264 Subpart CC must be managed using the applicable standards at 40 CFR § 264.1086. For the containers permitted in the State permit having a design capacity between 0.1 cubic meter (m³) and 0.46 m³ and greater than 0.46 m³, which are not in light material service, you must comply with the Level 1 container standards specified at 40 CFR § 264.1086(c). For the containers permitted in the State permit having a design capacity greater than 0.46 m³, which are in light material service, you must comply with the Level 2 container standards specified at 40 CFR § 264.1084(d).

You must not conduct waste stabilization process, as defined in 40 CFR § 265.1081, in containers.

III.A CONTAINER LEVEL 1 STANDARDS

When storing hazardous waste in Level 1 containers you must comply with the following requirements:

III.A.1 A Level 1 container must satisfy one of the following requirements (40 CFR § 264.1086(c)(1):

- (a) meet the applicable U.S. Department of Transportation (DOT) regulations as specified in 40 CFR § 264.1086(f);
- (b) be equipped with a cover and closure devices with an acceptable tightness and construction materials in accordance with 40 CFR § 264.1086(c)(1)(ii); or
- (c) be an open-top container with organic vapor suppressing barrier to prevent hazardous waste from being exposed to the atmosphere as specified in 40 CFR § 264.1086(c)(1)(iii).

Level 1 containers which do not meet U.S. DOT regulation specified in 40 CFR § 264.1086(f) must be equipped with covers and closure devices suitable for the physical and chemical characteristics of hazardous waste in containers to minimize exposure of the hazardous waste to the atmosphere and to maintain container integrity throughout the life of the container. (40 CFR § 264.1086(c)(2))

III.A.2 For Level 1 containers, all covers and closure devices must be in closed position whenever hazardous waste is in a container. Opening of a closure device or cover is allowed if it meets the purpose and operates as defined in 40 CFR § 264.1086(c)(3)(i) through (v).

III.A.3 You must inspect the Level 1 containers and their covers and closure devices in accordance with 40 CFR § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 CFR § 264.1086(c)(4)(iii).

III.B CONTAINER LEVEL 2 STANDARDS

When storing hazardous waste in Level 2 containers you must comply with the following requirements

III.B.1 A Level 2 container must satisfy one of the following requirements (40 CFR § 264.1086(d)(1)):

- (a) meet the applicable U.S. DOT regulations as specified in 40 CFR § 264.1086(f);
- (b) operates with no detectable organic emissions as defined in 40 CFR § 265.1081 and determined in accordance with the procedure specified in 40 CFR § 264.1086(g); or
- (c) be vapor tight within the preceding 12 months by using 40 CFR Part 60, Appendix A, Method 27 in accordance with the procedure specified in 40 CFR § 264.1086 (h).

III.B.2 Transfer of hazardous waste in or out of a Level 2 container must be conducted in such a manner as to minimize exposure of the hazardous waste to the atmosphere, as specified by 40 CFR § 264.1086(d)(2).

III.B.3 Whenever a hazardous waste is in a Level 2 container, you must install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as specified in 40 CFR § 264.1086(d)(3).

III.B.4 You must inspect the Level 2 containers and their covers and closure devices as specified in 40 CFR § 264.1086(d)(4)(i) and (ii). When a defect is detected for the container, cover, or closure devices, you must repair the defect in accordance with 40 CFR § 264.1086(d)(4)(iii).

III.C RECORDKEEPING AND REPORTING REQUIREMENTS

You must comply with all applicable recordkeeping and reporting requirements described in 40 CFR § 264.1089 and § 264.1090 for all containers.

Administrative Record Index (Draft RCRA PERMIT)

PPG Industries, Inc.
Barberton, Ohio
OHD 004 198 917

<u>Title</u>	<u>Date</u>	<u>Prepared by</u>
1. Part B Application	November 22, 2010	PPG
2. EJ Report	June 2010	EPA
3. State RCRA Final Permit	September 24, 2010	OEPA
4. Subparts AA, BB, and CC Information	April 15, 2011	PPG
5. Permit Modification-Amendment 7	September 6, 2011	PPG
6. Draft RCRA Permit	May 2012	EPA

EPA: United States Environmental Protection Agency

OEPA: Ohio Environmental Protection Agency

RCRA: Resource Conservation Recovery Act

EJ: Environmental Justice

Subpart AA: Air Emission Standards for Process Vents

Subpart BB: Air Emission Standards for Equipment Leaks

Subpart CC: Air Emission Standards for Tanks, Surface Impoundments and Containers