



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

March 30, 2018

REPLY TO THE ATTENTION OF:

Mr. Steve McCorry
EHS Manager
PPG Industries Ohio, Inc.
559 Pittsburgh Road
Circleville, Ohio 43113

Re: Final Federal RCRA Permit, PPG Industries Ohio, Inc.
Circleville, Ohio, OHD 004 304 689

Dear Mr. McCorry:

Enclosed is a copy of the final Federal portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit for the above-referenced facility. The complete RCRA Hazardous Waste permit contains both Federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Ohio RCRA program authorized under Title 40 of the Code of Federal Regulations (40 C.F.R.) Part 271. Any hazardous waste activity not included in the Federal portion of the RCRA permit or in the State portion of the RCRA permit is prohibited when such activity requires a RCRA Hazardous Waste permit.

The draft Federal RCRA permit was publicly noticed in the Circleville Herald and the Circleville 100.5 (Radio U station) on or about September 29, 2017. A copy of the draft Federal RCRA permit was available for review at the Pickaway County District Public Library, 1160 N Court St., Circleville, OH 43113. The public comment period extended from October 5 to November 30, 2017. A public hearing regarding this draft permit was held on November 15, 2017, 6 pm at the Pickaway County District Library Main Branch 1160 N. Court St. Circleville, OH 43113.

No comment was received by the U.S. Environmental Protection Agency on the draft Federal RCRA permit during the public comment period and at the public hearing.

This Federal permit is effective on **May 15, 2018 and valid until December 22, 2027**, unless the Federal permit is revoked and reissued, or terminated pursuant to 40 C.F.R. § 270.41 and § 270.43. Failure to comply with any conditions of the Federal permit may result in civil and/or criminal penalties.

You may appeal the issuance of this permit by filing a petition for review with the Environmental Appeals Board as provided at 40 C.F.R. § 124.19.

A petition for review of any condition of a RCRA permit decision must be filed with the Environmental Appeals Board within 30 days after EPA serves notice of the issuance of the final permit decision. 40 C.F.R. § 124.19(a)(3). When EPA serves the notice by mail, service is deemed to be completed when the notice is placed in the mail, not when it is received. However, to compensate for the delay caused by mailing, the 30-day deadline for filing a petition is extended by three days if the final permit decision being appealed was served on the petitioner by mail. 40 C.F.R. § 124.20(d). Petitions are deemed filed when they are received by the Clerk of the Board at the address specified for the appropriate method of delivery. 40 C.F.R. § 124.19(a)(3) and 40 C.F.R. § 124.19(i). Additional information regarding petitions for review may be found in the Environmental Appeals Board Practice Manual (January 2013) and A Citizen's Guide to EPA's Environmental Appeals Board, both of which are available at http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument.

Eligibility to appeal the Federal permit is discussed further in 40 C.F.R. § 124.19. General filing requirements are contained in the Practice Manual, The Environmental Appeals Board and A Citizens' Guide to EPA's Environmental Appeals Board.

All documents that are sent through the U.S. Postal Service (except by Express Mail) must be addressed as follows:

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1200 Pennsylvania Avenue, NW
Mail Code 1103M
Washington, DC 20460-0001

Documents that are hand-carried in person, delivered via courier, mailed by Express Mail, or delivered by a non-U.S. Postal Service carrier (e.g., Federal Express or UPS) must be delivered to:

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Avenue, NW
U.S. EPA East Building, Room 3334
Washington, DC 20004

A copy of the petition should also be sent to:

RCRA Branch (LR-17J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The procedures for filing an appeal are found in 40 C.F.R. § 124.19. The administrative appeal procedures must be completed prior to any action seeking judicial review.

If you have any questions concerning this permit, please contact Mr. Jae Lee of my staff, at (312) 886-3781.

Sincerely,

A handwritten signature in black ink that reads "Michael D. Harris". The signature is written in a cursive style.

Michael D. Harris
Acting Division Director
Land and Chemicals Director

Enclosures

cc: Bradley Mitchell, OEPA

FINAL
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: PPG Industries Ohio, Inc.
559 Pittsburgh Road
Circleville, Ohio 43113

Owner: PPG Industries Ohio, Inc.
559 Pittsburgh Road
Circleville, Ohio 43113

Operator: PPG Industries Ohio, Inc. and PPG Industries, Inc.
559 Pittsburgh Road
Circleville, Ohio 43113

U.S. EPA Identification Number: OHD 004 304 689

Effective Date: May 15, 2018

Expiration Date: December 22, 2027

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 Ohio, Inc. (addressed in the second person as "you" or "Permittee") in connection with the hazardous waste management operations at the PPG Industries Ohio, Inc. facility located in Circleville, 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 USC § 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 C.F.R.)).

Specifically, this permit addresses air emission standards for equipment leaks, containers and tanks. See 40 C.F.R. Part 264, Subparts BB and CC.

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions issued by the State of Ohio's RCRA program authorized under 40 C.F.R. Part 271 (hereinafter the "State RCRA permit"). Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

The State previously issued a RCRA permit on December 22, 2017. (The effective and expiration dates of that earlier State RCRA permit were December 22, 2017 and December 22, 2027, respectively.)

Permit Approval:

On June 30, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 USC § 6926, and 40 C.F.R. Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since then. However, because EPA has not yet authorized the State of Ohio to administer certain HSWA regulations, including the air emission standards for equipment leaks (40 C.F.R. Part 264, Subpart BB) and tanks and containers (40 C.F.R. Part 264, Subpart CC), EPA is issuing the RCRA permit requirements for operations at your facility which fall under this regulation.

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 C.F.R. Parts 124, 260, 261, 262, 264, 268, 270, and applicable provisions of RCRA. You must also comply with the State permit.

This permit is based on the assumption that (1) the information submitted in your RCRA Part A and B Permit Renewal Application dated July 2016 and all other revisions and addendums to that application (hereinafter referred to as the "Application") is complete and accurate and (2) the facility is configured, operated and maintained as specified in the 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 C.F.R. §§ 270.41, 270.42 and 270.43; and for enforcement action. You must promptly inform EPA of any deviation from, or changes in, the information in the Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

March 2018

PPG Industries Ohio, Inc.

OHD 004 304 689

Opportunity to Appeal:

Petitions for review must be submitted within 30 days after EPA serves notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may file a petition for review only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 C.F.R. § 124.19.

Effective Date:

This permit is effective as of May 15, 2018 and will remain in effect until December 22, 2027, unless revoked and reissued under 40 C.F.R. § 270.41, terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a).

By:

Michael D. Harris

Michael D. Harris
Acting Division Director
Land and Chemicals Director

Date: 3/30/2018

OHD 004 304 689
PPG Industries Ohio, Inc., Circleville, Ohio

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

This permit contains the federal RCRA permit conditions. You also have a state RCRA permit. You are hereby allowed to manage hazardous waste at PPG Industries Ohio, Inc. (“facility”) in accordance with this permit and the effective state RCRA permit. Under this permit, the operation of containers storing RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage of RCRA hazardous wastes in containers are subject to the conditions in the state RCRA permit. Any hazardous waste activity which requires a RCRA permit and is not included either in this permit or the state RCRA permit is prohibited.

Subject to 40 C.F.R. § 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 C.F.R. Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 C.F.R. Part 264 regarding leak detection systems; or (4) are promulgated under Subparts AA, BB, or CC of 40 C.F.R. Part 265 limiting air emissions. (40 C.F.R. § 270.4)

This permit does not: (1) convey any property rights or any exclusive privilege (40 C.F.R. § 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 U.S.C. §§ 9601 *et seq.* (commonly known as “CERCLA”); or (3) any other law protecting public health 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 C.F.R. §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 C.F.R. § 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 C.F.R. § 270.30(f))

You may request a modification of this permit under the procedures specified in 40 C.F.R. § 270.42, based on the classifications listed in Appendix I to 40 C.F.R. § 270.42. A Class 1 modification is generally allowed without prior approval by EPA except under certain conditions as described in 40 C.F.R. § 270.42(a)(2). A Class 2 modification requires prior approval by EPA as described in 40 C.F.R. § 270.42(b). 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 C.F.R. § 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 C.F.R. § 270.42(b)(8) has been delegated to the Director of the Land and Chemicals Division of EPA, Region 5. Thus, for the purposes of this permit, the term Director shall refer to the Division Director of EPA Region 5's Land and Chemicals Division.) Procedures for a Class 3 modification are specified in 40 C.F.R. § 270.42(c).

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 C.F.R. § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 C.F.R. § 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 C.F.R. § 124.16(a))

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 C.F.R. 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

I.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 C.F.R. § 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, or modification; or denial of a permit renewal application. (40 C.F.R. § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue an activity this permit regulates after its 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 C.F.R. §§ 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 for a fixed term not to exceed 10 years from this permit's effective date. 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 C.F.R. § 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 C.F.R. §§ 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 C.F.R. § 270.30(c))

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, you must promptly take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must promptly implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 C.F.R. § 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 C.F.R. § 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, 44 USC §§ 3501 *et seq.* (40 C.F.R. §§ 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:

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 assure 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. (40 C.F.R. § 270.30(i))

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 feed streams, treatment residues, or other hazardous wastes to be analyzed must be the appropriate methods from Appendix I of 40 C.F.R. Part 261, or the methods specified in the Waste Characteristics which is Section C of the Application, 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 Characteristics. (40 C.F.R. § 270.30(j)(1))

I.E.9.b You must retain, at the facility, all records as specified in 40 C.F.R. § 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 C.F.R. §§ 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 C.F.R. § 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 C.F.R. § 270.30(l)(2))

I.E.12 Certification of Construction

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, in accordance with 40 C.F.R. 270.30(l)(2)(i). That letter must state that the portions of the facility covered 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 Within 15 days of the date of submission of the letter in I.E.12, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste in accordance with 40 C.F.R. § 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 in writing and obtain prior written approval of the Director before transferring ownership or operational control of the facility (40 C.F.R. § 270.42, Appendix I). Under 40 C.F.R. § 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 40 C.F.R. Parts 264, 268, and 270, and you must provide a copy of the RCRA permit to the new owner or operator. (40 C.F.R. §§ 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 circumstances.

I.E.14.b The report must include the following information (40 C.F.R. §§ 270.30(l)(6) and 270.33): (1) release of any hazardous waste that may endanger public drinking water supplies; (2) 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. You must include the following information:

- (1) Name, title and telephone number of the person making the report;
- (2) Name, address and telephone number of the owner or operator;
- (3) Name, address and telephone number of the facility;
- (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 Sections 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 Sections I.E.14.a and I.E.14.b of this permit. (40 C.F.R. §§ 270.30(1)(6) and 270.30(h))

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Section I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Section I.E.14 of this permit. (40 C.F.R. § 270.30(1)(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 Application or other submittal, or submitted incorrect information in the 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 C.F.R. §§ 270.30(1)(11) and 270.30(h))

I.E.16.b All other requirements contained in 40 C.F.R. § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all 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 C.F.R. § 270.11. (40 C.F.R. § 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 sent or given to the Director should be sent by certified mail or express mail, or hand-delivered to the U.S. Environmental Protection Agency Region 5, RCRA Branch, at the following address:

RCRA Branch, LR-17J
Land and Chemicals Division
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

I.H CONFIDENTIAL INFORMATION

In accordance with 40 C.F.R. Part 2, Subpart B, you may claim any information this permit requires, or 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 C.F.R. Part 2 (40 C.F.R. § 270.12). You have the burden of substantiating that the claimed information is confidential, and U.S. EPA may request further information from you regarding such claim, and may reasonably determine which such information to treat as confidential.

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 C.F.R. §§ 264.13, 264.1035, 264.1064, 264.1084, 264.1088, 264.1089 and 40 C.F.R. § 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

You must maintain notifications from generators that are required by 40 C.F.R. § 268.7 to accompany an incoming shipment of hazardous wastes subject to 40 C.F.R. Part 268, Subpart C, that specify treatment standards, as required by 40 C.F.R. §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit on site, including all of 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 enforcement action under Section 3008 of RCRA. This 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 C.F.R. Parts 124, 260, 261, 262, 264, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from the approved designs, plans and 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 Section 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.

You shall not operate the process vents defined in 40 C.F.R. § 264.1031.

**SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS
(40 C.F.R. PART 264 SUBPART BB)**

The Part B Permit Application states that you are operating equipment subject to 40 C.F.R. Part 264 Subpart BB. Such equipment includes pump, valves, and pressure relief valves.

The air emission standards for equipment leaks, 40 C.F.R. Part 264 Subpart BB (Subpart BB), at 40 C.F.R. § 264.1064(m) provide:

The owner or operator of a facility with equipment that is subject to this subpart and to regulations at 40 C.F.R. part 60, part 61, or part 63 may elect to determine compliance with this subpart either by documentation pursuant to § 264.1064 of this subpart, or by documentation of compliance with the regulations at 40 C.F.R. part 60, part 61, or part 63 pursuant to the relevant provisions of the regulations at 40 [C.F.R.] part 60, part 61 or part 63. The documentation of compliance under regulations at 40 C.F.R. part 60, part 61, or part 63 shall be kept with or made readily available with the facility operating record.

The Part B Application provides that, in accordance with 40 C.F.R. § 264.1064(m), the Permittee has elected to determine compliance with Subpart BB by documenting compliance with 40 C.F.R. Part 61 Subpart V (National Emission Standard for Equipment Leaks (Fugitive Emission Sources)).

For purposes of this permit, EPA considers the written statement from a responsible company official in the Part B Application as an election to determine compliance with Subpart BB by documenting compliance with 40 C.F.R. Part 61 Subpart V. As set forth at 40 C.F.R. § 264.1064(m), the documentation of compliance with the regulations at 40 C.F.R. Part 61 Subpart V (Subpart BB Determination of Compliance) must be kept with or made readily available with the facility operating record.

For any proposed changes of the Subpart BB Determination of Compliance, you must submit a Class I permit modification request providing for the application of 40 C.F.R. Part 264, Subpart BB to such hazardous waste equipment.

SECTION III – AIR EMISSION STANDARDS FOR TANKS AND CONTAINERS (40 C.F.R. PART 264 SUBPART CC)

You are permitted by the State portion of the permit to store hazardous wastes in 26 tanks. Five of these tanks (R-1707 through R-1710, 5,250 gallons each, and R-1711, 12,086 gallons) are located at the RCRA waste storage building. Twenty-one of these tanks (1501 through 1506 and 1511 through 1520, each 17,000 gallons, 1521 and 1522, each 2,300 gallons, and 1523 through 1525, each 1,700 gallons) are located at the Emergency Recovery Unit (ERU) area. The total tank capacity is 314,786 gallons.

You are also permitted to store hazardous waste in containers in a permitted storage area, ERU Drum Storage Area. The maximum capacity of the container storage areas is 105,000 gallons.

You must comply with all applicable requirements of 40 C.F.R. § 264.1080 through 40 C.F.R. § 264.1090, regarding air emission standards for containers and tanks handling hazardous waste. All containers and tanks not exempt from 40 C.F.R. Part 264 Subpart CC must be managed using the applicable standards at 40 C.F.R. § 264.1084 and 40 C.F.R. § 264.1086. The tanks and containers permitted in the state RCRA permit, described above, are Level 2 tanks and Level 1 and Level 2 containers and must comply with the standards at 40 C.F.R. § 264.1084(d) (Tank Level 2 standards), 40 C.F.R. § 264.1086(c) (Container Level 1 standards), and 40 C.F.R. § 264.1086(d) (Container Level 2 standards), respectively.

You must not conduct a waste stabilization process, as defined at 40 C.F.R. § 265.1081, in containers and tanks which contain hazardous waste.

III.A LEVEL 1 CONTAINER REQUIREMENTS

You must manage the containers with a design capacity greater than 0.1 m³ (26.4 gallons) and less than or equal to 0.46 m³ (121 gallons), and the containers with a design capacity greater than 0.46 m³ (121 gallons) that are not in light material service, as defined in 40 C.F.R. § 265.1081, with Container Level 1 standards as described at 40 C.F.R. § 264.1086(c). 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 C.F.R. § 264.1086(c)(1)):

- (a) meet the applicable Department of Transportation (DOT) regulations as specified in 40 C.F.R. § 264.1086(f),
- (b) be equipped with a cover and closure devices as specified in 40 C.F.R. § 264.1086(c)(1)(ii), or
- (c) be an open-top container with an organic vapor suppressing barrier as specified in 40 C.F.R. § 264.1086(c)(1)(iii).

Containers, which do not meet DOT regulation specified in 40 C.F.R. § 264.1086(f), must be equipped with covers and closure devices, as applicable to the container, that are composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and to maintain the equipment integrity, for as long as the container is in service. Factors to be considered in selecting the materials of construction and designing the cover and closure devices shall include: organic vapor permeability, the effects of any contact with the hazardous waste or its vapor managed in the container; the effects of outdoor exposure of the closure device or cover material to wind, moisture, and sunlight; and the operating practices for which the container is intended to be used. (40 C.F.R. § 264.1086(c)(2))

III.A.2 Whenever hazardous waste is in a container, you shall install all covers and closure devices and secure and maintain each closure device in the closed position as specified in 40 C.F.R. § 264.1086(c)(3). Opening of a closure device or cover is allowed if it meets the purposes and respective requirements specified in 40 C.F.R. § 264.1086(c)(3)(i) through (v).

III.A.3 You must inspect all containers and their covers and closure devices in accordance with 40 C.F.R. § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 C.F.R. § 264.1086(c)(4)(iii).

III.A.4 As specified in 40 C.F.R. § 264.1086(c)(5), you must maintain at the facility a copy of the procedure used to determine that containers with a capacity of 0.46 m³ or greater which do not meet applicable DOT regulations are not managing hazardous waste in light material service.

III.B LEVEL 2 CONTAINER REQUIREMENTS

You must manage the containers with a design capacity greater than 0.46 m³ (121 gallons) that are in light material service, as defined in 40 C.F.R. § 265.1081, with Container Level 2 standards as described at 40 C.F.R. § 264.1086(d). When storing hazardous waste in Level 2 containers you must comply with the following requirements:

III.B.1 You shall receive and handle a container complying with one of the following requirements as specified in 40 C.F.R. § 264.1086(d)(1):

III.B.1.a A container that meets the applicable U.S. Department of Transportation regulations on packaging hazardous materials for transportation as specified in 40 C.F.R. § 264.1086(f);

III.B.1.b A container that operates with no detectable organic emissions as defined in 40 C.F.R. § 265.1081 and determined in accordance with the procedure specified in 40 C.F.R. § 264.1086(g); or

III.B.1.c A container that has been demonstrated within the preceding 12 months to be vapor-tight by using 40 C.F.R. Part 60, appendix A, Method 27 in accordance with the procedure specified in 40 C.F.R. § 264.1086(h).

III.B.2 You shall transfer hazardous waste into or out of a container in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, as specified in 40 C.F.R. § 264.1086(d)(2). When transferring hazardous waste into or out of a container, you shall conduct such transferring activity by opening only the bung portion of the container. You shall not open the entire top portion of a container to transfer hazardous waste into or out of a container at any time.

III.B.3 For any treatment activity in containers that is not prohibited, you shall comply with the requirements specified in Section III.B.2.

III.B.4 Whenever a hazardous waste is in a container using level 2 controls, you shall install all covers and closure devices for the container and as specified in 40 C.F.R. § 264.1086(d)(3), except as specified at 40 C.F.R. § 264.1086(d)(3)(i) through (v).

III.B.5 You shall inspect all containers and their covers and closure devices in accordance with 40 C.F.R. § 264.1086(d)(4)(i) and (ii). When a defect is detected for a container, cover, or closure devices, you shall repair the defect in accordance with 40 C.F.R. § 264.1086(d)(4)(iii).

III.C REQUIREMENTS FOR LEVEL 2 TANKS

You must manage all of the tanks containing hazardous waste with Tank Level 2 standards as described at 40 C.F.R. § 264.1084(d). When storing hazardous waste in Level 2 tanks, you must comply with the following requirements:

All of the tanks shall be covered by a fixed roof and vented directly through the closed vent system to a control device in accordance with the following requirements specified

in 40 C.F.R. §§ 264.1084(g), (j), (k), and (l):

III.C.1 The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the liquid in the tank.
(40 C.F.R. § 264.1084(g)(1)(i))

III.C.2 Each opening in the fixed roof not vented to the control device shall be equipped with a closure device. If the pressure in the vapor headspace underneath the fixed roof is less than atmospheric pressure when the control device is operating, the closure devices shall be designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the cover opening and the closure device. If the pressure in the vapor headspace underneath the fixed roof is equal to or greater than atmospheric pressure when the control device is operating, the closure device shall be designed to operate with no detectable organic emissions.
(40 C.F.R. § 264.1084(g)(1)(ii))

III.C.3 The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the hazardous waste to the atmosphere, to the extent practical, and will maintain the integrity of the fixed roof and closure devices throughout their intended service life. Factors to be considered when selecting the materials for and designing the fixed roof and closure devices shall include: organic vapor permeability, the effects of any contact with the liquid and its vapor managed in the tank; the effects of outdoor exposure to wind, moisture, and sunlight; and the operating practices used for the tank on which the fixed roof is installed. (40 C.F.R. § 264.1084(g)(1)(iii))

III.C.4 Whenever a hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position and the vapor headspace underneath the fixed roof vented to the control device except as provided in 40 C.F.R. § 264.1084(g)(2)(i) and (ii). (40 C.F.R. § 264.1084(g)(2))

III.C.5 You must inspect and monitor the air emission control equipment in accordance with the requirements specified in 40 C.F.R. §§ 264.1084(g)(3), 264.1084(l), and 264.1087. In the event that a defect is detected, you shall repair the defect in accordance with 40 C.F.R. § 264.1084(k). You must maintain a record of the inspection in accordance with the requirements specified at 264.1089(b). (40 C.F.R. § 264.1084(g)(3))

III.C.6 You shall transfer hazardous waste to a tank in accordance with 40 C.F.R. § 264.1084(j).

III.C.7 The closed vent system shall meet the requirements of 40 C.F.R. § 264.1087(b).

III.C.7.a The closed vent system shall route the gasses, vapors and fumes emitted from the hazardous waste in the tanks to control devices that meet the requirements specified in 40 C.F.R. §264.1087(c).

III.C.7.b The closed vent system shall be designed and operated in accordance with the requirements specified in 40 C.F.R. §264.1033(k). A closed vent system shall meet either of the following design requirements:

(i) each closed vent system shall be designed to operate with no detectable emissions, as indicated by an instrument reading of less than 500 ppm by volume above background as determined by the procedure in 40 C.F.R. § 264.1034(b) and by visual inspections; or

(ii) each closed vent system shall be designed to operate at a pressure below atmospheric pressure. The system shall be equipped with at least one pressure gauge or other pressure measurement device that can be read from a readily accessible location to verify that negative pressure is being maintained in the closed vent system when the control device is operating.

III.C.7.c The closed vent system shall not include any bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device.

III.C.7.d You shall inspect and monitor each closed vent systems as specified in 40 C.F.R. § 264.1033(l). Each closed vent system that is used to comply with III.C.7.b(i) above shall be inspected and monitored in accordance with the requirements of 40 C.F.R. § 264.1033(l)(1). Each closed vent system that is used to comply with III.C.7.b(ii) above shall be inspected and monitored in accordance with the requirements of 40 C.F.R. § 264.1033(l)(2). You shall comply with the requirements at 40 C.F.R. § 264.1033(l)(3).

III.C.8 The control device shall meet the requirements of 40 C.F.R. § 264.1087(c).

III.C.8.a You shall control the air emissions from Tanks 1707 through 1711 which are located at the RCRA Waste Storage Building by venting the tanks through closed vent systems to the Thermal Oxidizer Unit (TOU), which must be designed and operated to recover the organic vapors vented to the unit with an efficiency of 95 percent or greater by weight as set forth at 40 C.F.R. § 264.1033(c). (40 C.F.R. § 264.1033(c))

III.C.8.b You shall control the air emissions from Tanks 1501 through 1506 and 1511 through 1525 which are located at the ERU area by venting the tanks to one

of two overflow tanks that are vented through closed vent systems to ERU rotary kiln, which must be designed and operated to recover the organic vapors vented to the unit with an efficiency of 95 percent or greater by weight as set forth at 40 C.F.R. § 264.1033(c). During shutdown of the ERU kiln, the overflow tanks shall be vented through closed vent system to an activated carbon bin, which must be designed and operated to recover the organic vapors vented to the unit with an efficiency of 95 percent or greater by weight as set forth at 40 C.F.R. § 264.1033(c). (40 C.F.R. § 264.1033(c))

III.C.8.c You must demonstrate compliance with the minimum 95 percent by weight removal efficiency of the total organic content of the inlet vapor stream vented to the carbon adsorption system. (40 C.F.R. § 264.1087(c)(1)(i))

III.C.8.d You shall comply with the requirements specified in 40 C.F.R. § 264.1087(c)(2)(i). The planned routine maintenance of the carbon adsorption system, during which the 95 percent removal efficiency does not meet the specifications in 40 C.F.R. § 264.1087(c)(1)(i), shall not exceed 240 hours per year. (40 C.F.R. § 264.1087(c)(2)(i))

III.C.8.e You must comply with the requirements specified in 40 C.F.R. § 264.1087(c)(2)(ii) through (c)(2)(vi), including requirements concerning the planned routine maintenance, control system device malfunction, record keeping, correction of device system malfunction, and other operating requirements.

III.C.8.f You shall operate and maintain the control device in accordance with the requirements of 40 C.F.R. § 264.1087(c)(3). You shall replace the existing carbon in the control device with fresh carbon on a regular basis by using one of the following procedures:

(i) You shall monitor the concentration level of the organic compounds in the exhaust vent stream from the carbon adsorption system on a regular schedule. The monitoring frequency shall be daily or at an interval no greater than 20 percent of the time required to consume the total carbon working capacity established as a requirement of 40 C.F.R. § 264.1035(b)(4)(iii)(G), whichever is longer. You shall replace the existing carbon in the control device with fresh carbon immediately when carbon breakthrough is indicated. (40 C.F.R. §§ 264.1087(c)(3)(i) and 264.1033(h)(1))

(ii) You shall replace the existing carbon with fresh carbon at a regular, predetermined time interval that is less than the design carbon replacement interval established as a requirement of 40 C.F.R. §

264.1035(b)(4)(iii)(G). (40 C.F.R. §§ 264.1087(c)(3)(i) and 264.1033(h)(2))

III.C.8.g All carbon that is removed from the carbon adsorption system after use shall be managed in accordance with the requirements of 40 C.F.R. §§ 264.1087(c)(3)(ii) and 264.1033(n) regardless of the average volatile organic concentration of the carbon. You shall prepare and maintain records sufficient to demonstrate that the requirements of this provision are satisfied as part of the facility operating record. You shall document that all carbon that is a hazardous waste and that is removed from the control device is managed as specified in 40 C.F.R. § 264.1033(n), regardless of the average volatile organic concentration of the carbon.

III.C.9 Closed vent systems and control devices used to comply with this permit shall be operated at all times when emissions may be vented to them. (40 C.F.R. § 264.1033(m))

III.D RECORDKEEPING AND REPORTING REQUIREMENTS

III.D.1 For container storage areas and tanks, you must comply with all applicable recordkeeping and reporting requirements described in 40 C.F.R. §§ 264.1089 and 264.1090.

III.D.2 You must prepare and maintain records for the closed vent system and the control devices described in the manner described in 40 C.F.R. § 264.1089, including 40 C.F.R. §§ 264.1089(a), (b), and (e), and 40 C.F.R. § 264.1035.

III.D.3 You must comply with all reporting requirements for the control devices under 40 C.F.R. § 264.1090(c) and (d) and 40 C.F.R. § 264.1036. Such reports shall be sent to EPA (at the address specified in Section I.G).

RESPONSE SUMMARY

RESPONSE TO COMMENTS ON THE FEDERAL DRAFT PERMIT FOR PPG Industries Ohio, Inc., Circleville, Ohio OHD 004 304 689

No comments were received by U.S. Environmental Protection Agency on the draft Federal RCRA permit during the public comment period (from October 5, 2017 to November 30, 2017) and the public hearing held on November 15, 2017. Therefore, no conditions of the draft permit were changed in the final permit, with the exception of changes necessary to identify that the permit has been finalized.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

March 30, 2018

REPLY TO THE ATTENTION OF:

Reference Desk Librarian
Pickaway County District Public Library
1160 N Court St,
Circleville, OH 43113

Re: Final Federal RCRA Permit, PPG Industries Ohio, Inc.
Circleville, Ohio, OHD 004 304 689

Dear Madam or Sir:

The U.S. Environmental Protection Agency intends to issue a final Hazardous Waste Management permit to PPG Industries Ohio, Inc., Circleville, Ohio. In accordance with the public involvement procedures in 40 Code of Federal Regulations Part 124, public notice was posted in the in the Circleville Herald and the Circleville 100.5 (Radio U station) on or about September 29, 2017. A copy of the draft Federal RCRA permit was available for review at the Pickaway County District Public Library, 1160 N Court St., Circleville, OH 43113. The public comment period extended from October 5 to November 30, 2017. A public hearing regarding this draft permit was held on November 15, 2017, 6 pm at the Pickaway County District Library Main Branch 1160 N. Court St. Circleville, OH 43113.

Please make available for public examination this letter and the enclosed documents for at least seventy-five (75) days under "Reference Materials – PPG Industries Ohio, Inc.". The following items are enclosed.

- Final Permit
- Response Summary
- Public Hearing Transcript
- Public Notification/Mailing List/Applicant
- Radio and Newspaper Notices

Thank you for your assistance. If you have any questions, please contact me at 312-886-3781.

Sincerely,

A handwritten signature in cursive script that reads "Jae B. Lee".

Jae B. Lee
Permit Writer
Land and Chemicals Division

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

March 30, 2018

REPLY TO THE ATTENTION OF:

Mr. Bradley Mitchell
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Post Office Box 1049
Columbus, Ohio 43266-0149

Re: Final Federal RCRA Permit, PPG Industries Ohio, Inc.
Circleville, Ohio, OHD 004 304 689

Dear Mr. Mitchell:

Enclosed please find a copy of the final Federal Resource Conservation and Recovery Act permit and cover letter to the above-referenced facility.

If you have any questions, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,

Mary S. Setnicar for M11

Mary S. Setnicar, Chief
RCRA/TSCA Programs Section

Enclosures

Administrative Record Index *(Final RCRA PERMIT)*

PPG Industries Ohio, Inc., Circleville, Ohio

OHD 004 304 689

<u>Title</u>	<u>Date</u>	<u>Prepared by</u>
1. Part A Application	July 2016	PPG
2. Part B Application	July 2016	PPG
3. EJ Information	October 2017	EPA
4. Email correspondences	March-September 2017	EPA/PPG
5. Drum Conveyor Sampling Plan	July 2017	PPG
6. Drum Conveyor Monitoring Data	July-August 2017	PPG
7. Draft Permit Fact Sheet	September 2017	OEPA/EPA
8. Draft State RCRA Permit	September 2017	OEPA
9. Draft Federal RCRA Permit	September 2017	EPA
10. Public Hearing Transcript	September 2017	OEPA/EPA
11. Radio and Newspaper Notices	September 2017	OEPA/EPA
12. Public Notification/Mailing List/Applicant	September 2017	OEPA/EPA
13. Final State RCRA Permit	December 22, 2017	OEPA
14. Response Summary	April 2018	EPA
15. Final RCRA Federal Permit	April 2018	EPA

** March-September 2017 Email Correspondences:

- a. March 6, 2017, from EPA to PPG: Subject: RCRA Permit Renewal Application Site Visit
- b. March 15, 2017 from PPG to EPA: Subject: RE: RCRA Permit Renewal Application Site Visit
- c. March 20, 2017, from EPA to PPG: Subject: RCRA Permit Renewal Application Site Visit
- d. March 20, 2017, from EPA to PPG: Subject: RCRA Permit Renewal Application Site Visit
- e. March 23, 2017 from PPG to EPA: Subject: RE: RCRA Permit Renewal Application Site Visit
- f. March 24, 2017 from PPG to EPA: Subject: RE: RCRA Permit Renewal Application Site Visit
- g. March 24, 2017, from EPA to PPG: Subject: RCRA Permit Renewal Application Site V
- h. March 24, 2017 from PPG to EPA: Subject: RE: RCRA Permit Renewal Application Site Visit
- i. March 24, 2017, from EPA to PPG: Subject: RCRA Permit Renewal Application Site V
- j. April 13, 2017 from PPG to EPA: Subject: RE: RCRA Permit Renewal Application Site Visit
- k. September 8, 2017 from PPG to EPA: Subject: LEI monitoring in ERU Drum Conveyor/Elevator room

EPA: United States Environmental Protection Agency

OEPA: Ohio Environmental Protection Agency

RCRA: Resource Conservation and Recovery Act

EJ: Environmental Justice

PPG: PPG: PPG Industries Inc.



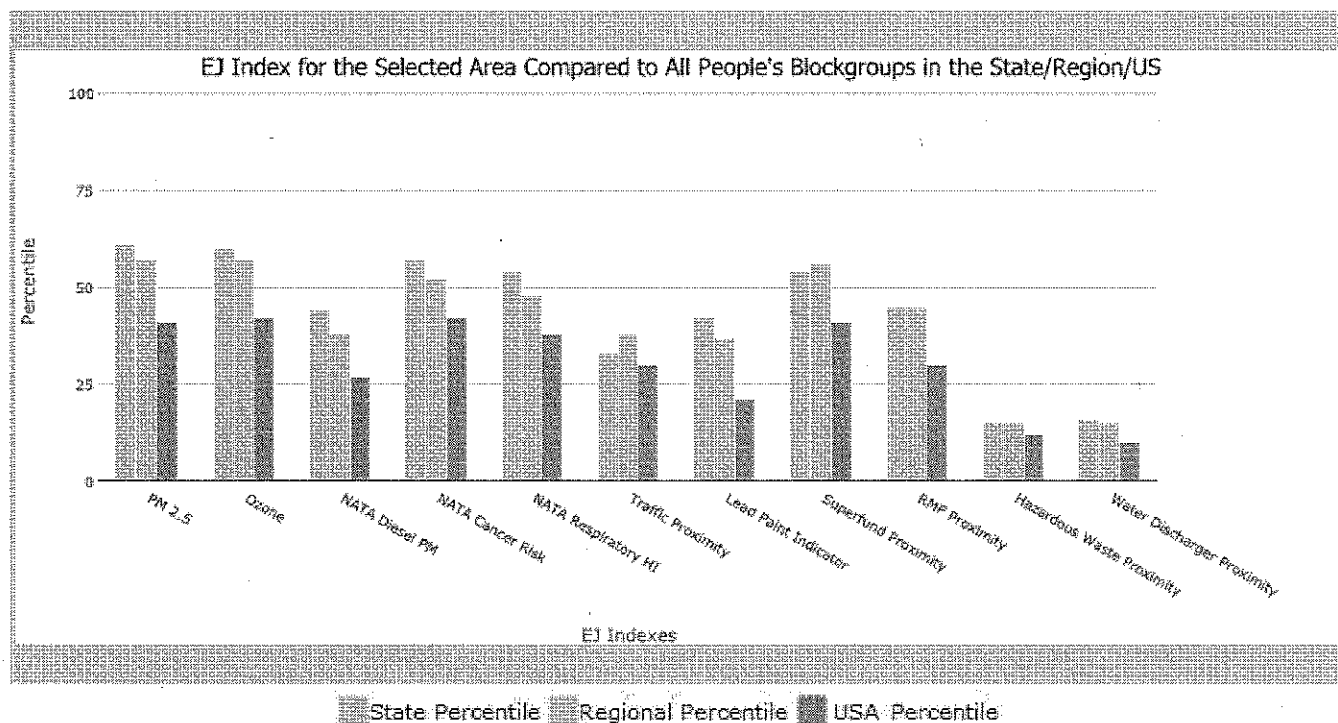
3 mile Ring Centered at 39.557103,-82.945262, OHIO, EPA Region 5

Approximate Population: 7,678

Input Area (sq. miles): 28.27

PPG Circleville

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	61	57	41
EJ Index for Ozone	60	57	42
EJ Index for NATA* Diesel PM	44	38	27
EJ Index for NATA* Air Toxics Cancer Risk	57	52	42
EJ Index for NATA* Respiratory Hazard Index	54	48	38
EJ Index for Traffic Proximity and Volume	33	38	30
EJ Index for Lead Paint Indicator	42	37	21
EJ Index for Superfund Proximity	54	56	41
EJ Index for RMP Proximity	45	45	30
EJ Index for Hazardous Waste Proximity*	15	15	12
EJ Index for Water Discharger Proximity	16	15	10



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

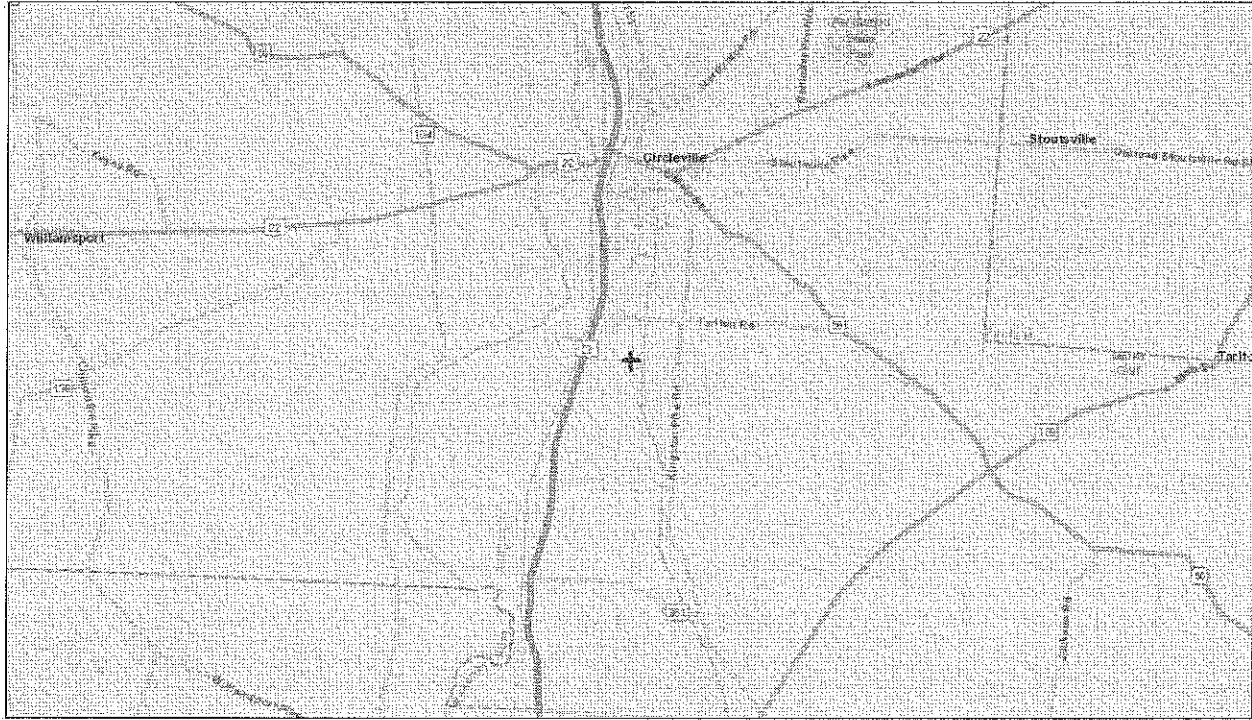


3 mile Ring Centered at 39.557103, -82.945262, OHIO, EPA Region 5

Approximate Population: 7,678

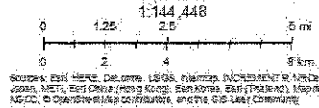
Input Area (sq. miles): 28.27

PPG Circleville



October 17, 2016

+ Digitized Point



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1
National Pollutant Discharge Elimination System (NPDES)	3

EJSCREEN Report (Version 2016)



3 mile Ring Centered at 39.557103,-82.945262, OHIO, EPA Region 5

Approximate Population: 7,678

Input Area (sq. miles): 28.27

PPG Circleville

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	11	11.3	31	10.6	63	9.32	86
Ozone (ppb)	54.9	52.8	83	50.3	93	47.4	86
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	1.56	0.995	86	0.931	80-90th	0.937	80-90th
NATA* Cancer Risk (lifetime risk per million)	45	37	86	34	90-95th	40	70-80th
NATA* Respiratory Hazard Index	2.2	1.8	73	1.7	80-90th	1.8	70-80th
Traffic Proximity and Volume (daily traffic count/distance to road)	120	170	71	370	58	590	54
Lead Paint Indicator (% Pre-1960 Housing)	0.56	0.42	69	0.39	70	0.3	79
Superfund Proximity (site count/km distance)	0.038	0.091	42	0.12	31	0.13	33
RMP Proximity (facility count/km distance)	0.32	0.44	66	0.51	61	0.43	68
Hazardous Waste Proximity* (facility count/km distance)	0.3	0.1	94	0.11	94	0.11	94
Water Discharger Proximity (facility count/km distance)	1.3	0.33	96	0.31	96	0.31	96
Demographic Indicators							
Demographic Index	27%	27%	65	29%	62	36%	45
Minority Population	5%	19%	31	24%	24	37%	12
Low Income Population	50%	34%	76	33%	79	35%	75
Linguistically Isolated Population	0%	1%	68	2%	58	5%	44
Population With Less Than High School Education	20%	11%	84	11%	84	14%	75
Population Under 5 years of age	7%	6%	69	6%	68	6%	65
Population over 64 years of age	16%	15%	62	14%	66	14%	68

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

+ The hazardous waste environmental indicator and the corresponding EJ index will appear as N/A if there are no hazardous waste facilities within 50 km of a selected location.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.



Draft Hazardous Waste Permit Renewal and Comment Period September 2017

Facility Name: PPG Industries Ohio, Inc.

U.S. EPA I.D.: OHD 004.304 689

Location:

559 Pittsburgh Road
Circleville, OH, 43113

Facility Owner:

PPG Industries Ohio, Inc.
559 Pittsburgh Road
Circleville, OH, 43113

Facility Operator:

PPG Industries Ohio, Inc.
559 Pittsburgh Road
Circleville, OH, 43113

Activity:

Permit renewal for the storage of hazardous waste in containers and tanks, treatment of hazardous waste via incineration at the Energy Recovery Unit, closure, and corrective action.

Comment Period:

October 5, 2017 to November 30, 2017

Submit Comments to:

Ohio EPA
Jessica Cáceres
Division of Environmental Response & Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-2924
jessica.caceres@epa.ohio.gov

U.S. EPA, Region 5
Mr. Jae Lee
RCRA/TSCA Programs Section, LR-17J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
lee.jae@epa.gov

What is the history of the hazardous waste program?

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include: to protect human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated, and to ensure that waste produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states to assume primary responsibility for implementing the hazardous waste regulations with oversight from the United States Environmental Protection Agency (U.S. EPA). U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state program is at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of their hazardous waste program.

Currently, the State of Ohio is not authorized by U.S. EPA to issue a permit for organic air emissions (40 CFR Part 264, Subparts AA, BB, and CC) from hazardous waste storage units. U.S. EPA has drafted a RCRA permit to address organic air emissions from hazardous waste storage units. U.S. EPA's draft permit and the State of Ohio's draft permit have been issued concurrently and both share the same comment period.

Draft Hazardous Waste Permit Renewal

How can I become more involved?

A public meeting will be held on November 15, 2017 at 6:00 PM at Pickaway County District Library Main Branch located at 1160 N. Court St. Circleville, OH 43113 to receive public comments. Oral comments will be received during the public meeting. All persons, including the applicant, may submit written comments relating to this draft action. Written comments may be submitted before the end of the comment period to the address in the box on the left.

The comment period begins on October 5, 2017, and ends on November 30, 2017. Copies of the permit application and the draft permit are available for review by the public at the following locations:

Ohio EPA, Central District Office
50 West Town St., Suite 700
Columbus, Ohio 43215
(614) 728-3778

Ohio EPA, Central Office
Division of Environmental Response and Revitalization
Lazarus Government Center
50 West Town St., Suite 700
Columbus, Ohio 43215
(614) 644-2924

U.S. EPA, Region 5
RCRA Branch, LR-171
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
(312) 886-3781

Copies of the Ohio draft permit and the federal draft permit are available for review by the public at:

Pickaway County District Public Library
1160 North Court Street
Circleville, OH 43113

The Ohio draft permit is available for review by the public online under the "What's New" tab at:

www.epa.ohio.gov/derr

The entire record for this draft action is available via Ohio EPA's eDocument portal:

<http://edocpub.epa.ohio.gov/publicportal/edocho.me.aspx>

Using the search function, search under the document type of "Permit" and then refine the search using the package number which is "450".

The federal draft permit is available for review by the public online at:

<https://www.epa.gov/oh/federal-rcra-permit-ppg-industries-inc-circleville-oh>

Within sixty (60) days of the close of the public comment period, Ohio EPA will, without prior hearing, issue the permit (or deny the request) in accordance with Chapter 3734 of the Ohio Revised Code (ORC). If Ohio EPA approves the application, taking into account public comments, a renewal permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

After the close of the public comment period, U.S. EPA will review all comments received and decide whether to issue the permit. The final decision will include notification to those who submitted written comments during the official comment period. U.S. EPA will also prepare and send to all responders a document answering significant comments. Within 30 days of a final decision, any person who submitted written comments or made a statement at the hearing if one is held may petition U.S. EPA's Environmental Appeals Board to review the decision.

Draft Hazardous Waste Permit Renewal

What does the facility do?

PPG Industries Ohio, Inc. manufactures resins used in paints and coatings for automobiles, beverage cans, printing inks, house paints, and other industrial applications. PPG Industries Ohio, Inc. also operates an Energy Recovery Unit for treatment of wastes by incineration. These wastes are generated by the Circleville plant onsite or are accepted from a network of other PPG facilities.

What would this hazardous waste permit allow the facility to do?

This permit allows PPG Industries Ohio, Inc. to conduct the following activities: 1) accept no more than 34,900 tons of hazardous waste in any one calendar year from off site sources 2) store 105,000 gallons of hazardous waste at any given time in the permitted container storage area at the Energy Recovery Unit, 3) store a total of 315,00 gallons of hazardous waste in 26 tanks, 4) treat hazardous waste at a rate not to exceed 27,400 gallons per day, 5) conduct Corrective Action activities on-site, 6) incinerate hazardous waste of the codes listed in the permit in the Energy Recovery Unit, and 7) conduct closure activities on-site.

Hazardous waste codes associated with these activities are D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F002, F003, F005, F039, K086, P003, P005, P022, P029, P030, P048, P054, P068, P077, P092, P098, P102, P106, P120, U001, U002, U003, U004, U006, U007, U008, U009, U012, U019, U023, U028, U031, U032, U034, U037, U041, U043, U044, U048, U051, U052, U053, U056, U057, U069, U070, U076, U077, U078, U080, U088, U092, U102, U108, U112, U113, U115, U117, U118, U121, U122, U123, U126, U133, U134, U135, U138, U140, U144, U145, U146, U147, U148, U149, U152, U154, U156, U159, U160, U161, U162,

U166, U170, U182, U188, U190, U194, U196, U201, U210, U211, U213, U219, U220, U221, U223, U226, U227, U228, and U239.

What is the regulatory basis to support this permit renewal?

The Director has determined that PPG Industries Ohio, Inc. has submitted an application for renewal one hundred eighty (180) days prior to the expiration date of its present permit which was issued by Ohio EPA on December 29, 2006. The Director has considered the application, inspection reports, a report regarding the facility's compliance with the present permit, and the rules adopted under ORC Section 3734. The Director has found that the Part B permit application meets the Director's performance standards and that the facility has a history of compliance with this chapter, rules adopted under it, the existing permit, and orders entered into, which demonstrates reliability, expertise, and competency to subsequently operate the facility under this chapter, the rules, and the permit.

Who can I contact for more information?

For additional information, please contact Grant Hewett at (614) 728-3878 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (800) 621-8431 ext. 63781.

