



State of Ohio Environmental Protection Agency

FILE COPY

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August 30, 2007

**PPG Industries Ohio, Inc.
LQG/TSD
OHD004304689
Pickaway County, CDO
PRTC**

Ms. Maura LaGreca
PPG Industries, Inc.
559 Pittsburgh Road
Circleville, OH 43113

Dear Ms. LaGreca:

I received your response to my June 26, 2007, Notice of Violation (NOV) letter on August 24, 2007. The documentation you submitted included information about loaded vehicles and waste inventory at the facility; photographs of unbroken lamps being managed at the resin manufacturing plant; a facility drawing designating all of the less than 90-day accumulation areas for the resin manufacturing plant and the Energy Recovery Unit (ERU); completed inspection checklists for spill cart #5; and a revised waste storage checklist for the resin plant and a revised RCRA daily list for the ERU. In addition, on August 14, 2007, Chris Bulinski and I verified that PPG returned to storing hazardous wastes only in areas of the facility permitted for such storage.

My review of this documentation reveals that PPG Industries Ohio, Inc. (PPG) has adequately demonstrated abatement of the following violations discovered during the June 18 and 19, 2007, inspection:

Letter Citation #	Rule Citation
3.	OAC Rule 3745-52-34(A)(2) and (3), Accumulation Time of Hazardous Waste (abated June 19, 2007)
4(a).	OAC Rule 3745-52-34(C)(1), Satellite Accumulation Area Requirements (abated June 18, 2007)
4(b).	OAC Rule 3745-52-34(C)(1), Satellite Accumulation Area Requirements
5.	OAC Rules 3745-52-34(A)(1)(a) and 3745-66-74, Inspections of Containers
6.	OAC Rule 3745-50-58(A), Failure to operate in accordance with the hazardous waste permit application, section F.2 Inspection Schedule

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

At this time, no further information is requested of PPG to address the following violation of ORC Section 3734.02(E) and (F) and Permit Condition A.1 discovered during the June 18 and 19, 2007, inspection:

1. **ORC Section 3734.02(E) and (F) and Permit Condition A.1, Storage of Hazardous Waste:** The permittee is only authorized to store hazardous waste in accordance with the terms and conditions of its Ohio hazardous waste permit. No person shall store hazardous waste in an area that is not permitted to store hazardous waste.

PPG has failed to submit a noncompliance report or procedures for reporting noncompliance as requested in Ohio EPA's June 26, 2007, NOV letter. Therefore, PPG remains in violation of the following hazardous waste rules:

2. **OAC Rule 3745-50-58(L)(10) and Permit Condition A.22, Other Noncompliance:** The permittee must report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the permittee is aware of such noncompliance.

PPG did not report the illegal storage of hazardous waste in areas that are not permitted to store hazardous waste as cited in Violation Number 1 of the June 26, 2007, NOV letter. The ERU was shutdown for approximately 42 days and did not burn any hazardous waste during this time.

In order to abate this violation, PPG must submit a report containing the information specified in OAC Rule 3745-50-58(L)(10) and Permit Condition A.22 for the illegal storage of hazardous waste in areas that are not permitted to store hazardous waste as cited in Violation Number 1 of the June 26, 2007, NOV letter.

If you should have any questions, please feel free to contact me at (614) 728-3887.

Sincerely,



Melissa Musko
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

c: Tammy McConnell, DHWM/CO
Chris Bulinski, DHWM/CDO
Isaac Wilder, DHWM/CO
Elissa Miller, Legal
CDO File

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NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.