



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

May 12, 2008

**RE: PPG Industries, Inc. Lordstown  
OHD 981958150  
Trumbull County  
RCRA Large Quantity Generator (LQG) CEI  
Notice of Violation/Return to Compliance**

John J. Doty  
Area Manager  
PPG Industries, Inc. Lordstown  
Automotive Coatings  
2823 Ellsworth-Bailey Road  
Warren, OH 44481

Dear Mr. Doty:

On April 24, 2008, Ohio EPA, Division of Hazardous Waste Management (DHWM), conducted a hazardous waste compliance evaluation inspection (CEI) of PPG Industries, Inc. Lordstown (PPG) located at 2823 Ellsworth-Bailey Road, Warren, Ohio. The purpose of the inspection was to determine your facility's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). The CEI included a discussion of facility operations, a review of records and a visual inspection of the facility operations and hazardous waste management areas. Darla S. Babb and Rick Palumbo represented PPG. Ohio EPA was represented by this writer and Sherry Slone.

PPG was inspected for the requirements of a large quantity generator (LQG) of hazardous waste. Enclosed is a copy of the inspection checklist pertaining to these requirements. A full discussion of the facility's processes and waste management units, as understood by Ohio EPA, is provided in the "General Remarks" section of the LQG checklist.

Included in the general remarks section is a brief discussion of PPG's Pollution Prevention (P2) activities and a suggestion for finding a non-hazardous solvent substitute for the gun cleaner process in the Pilot Production area of the facility. Substituting an effective non-hazardous solvent for the currently used hazardous solvent, may help PPG reduce the quantity of hazardous waste generated.

Also, included is a RCRA Subtitle C Site Identification/Verification Form. If any of the information in the form is incorrect, please let me know. You are not required to sign the form.

Based upon this inspection, the following represents Ohio EPA's findings.

During this inspection Ohio EPA found the following violation of Ohio's hazardous waste rules.

PPG was found in violation of Ohio Administrative Code (OAC) 3745-65-54(C), Amendment of the Contingency Plan.

A Large Quantity Generator must review and revise the contingency plan whenever the facility changes in its design, construction, operation, maintenance or other circumstances....

John J. Doty  
PPG Industries, Inc. Lordstown  
May 12, 2008  
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During the inspection Ohio EPA noted that PPG failed to revise the "Plot Plan" for the Lordstown Integrated Contingency Plan in regard to the location of the spill box and the need to show all of the <90 day HW accumulation areas on the plot plan. In addition, the information within item # 11, Protective & Emergency Equipment, was found in need of revision.

**Corrective Measures:** Later, on April 24, 2008, Ohio EPA received an e-mail message from Mr. Richard E. Kazmier with an attached "new" Plot Plan and a statement that the new Plot Plan has been incorporated into the Lordstown Integrated Contingency Plan and that the information within item # 11., Protective & Emergency Equipment, has been revised to reflect a change in the facility's operations.

Thank you for your cooperation in this matter. If you have any questions or need further assistance, please call me at (330) 963-1266. A response to this letter is not required.

Enclosed is a technical assistance guidance document on Universal Waste which may be helpful.

Information about Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) can be found on Ohio EPA's web site or by contacting OCAPP directly at (800) 329-7518.

The DHWM has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

Failure to list specific deficiencies in this communication does not relieve PPG from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve your facility from liability for any past or present violations of the state's hazardous waste laws.

Sincerely,



Kris L. Coder  
Environmental Specialist II  
Division of Hazardous Waste Management

KLC:cl  
Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Harry Sarvis, DHWM, CO  
Sherry Slone, DHWM, NEDO

	<b>Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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E-mail this completed form to [tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

<b>Site EPA ID No.</b>	<b>EPA ID Number:</b> OHD981958150
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<b>Site Name</b>	<b>Name:</b> PPG Industries, Inc. Lordstown	<b>Website:</b> (Optional)
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<b>Site Location Information</b>	<b>Street Address:</b> 2823 Ellsworth-Bailey Road		<b>State:</b> OH	
	<b>City, Town, or Village:</b> Warren		<b>Zip Code:</b> 44481	
	<b>County Name:</b> Trumbull			

<b>Site Land Type</b> (check only one)	<b>Private</b> x	<b>Count</b> y <input type="checkbox"/>	<b>Distric</b> t <input type="checkbox"/>	<b>Federal</b> <input type="checkbox"/>	<b>Indian</b> <input type="checkbox"/>	<b>Municipal</b> <input type="checkbox"/>	<b>State</b> <input type="checkbox"/>	<b>Othe</b> r <input type="checkbox"/>
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<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	32551
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<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	<b>First Name:</b> Richard		<b>MI:</b> E	<b>Last Name:</b> Kazmier		
	<b>Phone Number:</b> (216) 535-3420			<b>Phone Number Extension:</b>		
	<b>E-Mail Address:</b> <a href="mailto:kazmier@ppg.com">kazmier@ppg.com</a>					
	<b>Fax Number:</b> (216) 671-7133			<b>Fax Number Extension:</b>		
	<b>Street or P.O. Box:</b> 3800 W. 143 <sup>rd</sup> St.					
	<b>City, Town or Village:</b> Cleveland			<b>State:</b> OH		
			<b>Country:</b> USA		<b>Zip Code:</b> 44111	

<b>Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page</b>	<b>Name of Site's Legal Owner:</b> PPG Industries, Inc.				<b>Date Became Owner (mm/dd/yyyy):</b> 08/01/1987					
	<b>Owner Type:</b>	Private x	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	Stat e <input type="checkbox"/>	Other <input type="checkbox"/>	
	<b>Street or P.O. Box:</b> One PPG Place									
	<b>City, Town or Village:</b> Pittsburgh			<b>Owner Phone #:</b> (412) 434-3131						
	<b>State:</b> PA			<b>Country:</b> USA		<b>Zip Code:</b> 15272				
	<b>Name of Site's Operator:</b> PPG Industries, Inc.				<b>Date Became Operator (mm/dd/yyyy):</b> 08/01/1987					
	<b>Owner Type:</b>	Private x	County <input type="checkbox"/>	District <input type="checkbox"/>	Federa l <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	<b>Street or P.O. Box:</b> 3800 W. 143 <sup>rd</sup> Street									
	<b>City, Town or Village:</b> Cleveland			<b>Operator Phone #:</b> (216) 671-0050						
	<b>State:</b> OH			<b>Country:</b> USA		<b>Zip Code:</b> 44111				

<b>Violations Cited?</b>	X Yes <input type="checkbox"/> No
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<b>Type of Generator</b>	
<input type="checkbox"/> Not Regulated	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> United States Importer of Hazardous Waste
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

<b>Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)</b>	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

**Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))**

<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner



Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001	D008	D035	F003	F005		
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Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	John J. Doty, Area Manager, (not available during this inspection); Darla S. Babb, Lead Operator; Rick Palumbo, Lordstown Application Building Manager.
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Appear not to be a used oil generator; towmotor batteries are taken by the maintenance company that services their towmotors; fluorescent lamps were changed throughout the facility a couple of years ago, no spent lamps were noted onsite; electronic wastes go back to their Cleveland facility.	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Kris Coder	Sherry Slone	April 24, 2008; 10:30 a.m.

OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG:  $\leq 100$  Kg. (Approximately 25-30 gallons) of waste in a calendar month or  $< 1$  Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: safety glasses with side shields and steel toed boots

**General Remarks:** PPG Industries, Inc. Lordstown is adjacent to the Lordstown General Motors facility and supplies all the coatings and paints for this facility, as well as, other automotive manufacturing facilities. Also, at this location they do testing and other Quality Control operations on the coatings and paints. The facility consists of two separate buildings, one is the "Service facility" and the other is the "Applications Building". The Service Building operates two shifts with four people and the Application Building (includes production, lab, spray room, maintenance and records) operates one staggered shift and has 6 people. The Service Building is the "just in time" warehouse where all virgin paints come in "un-reduced" from other PPG facilities. Here they add catalysts, solvents and tints for application at the Lordstown GM facility. The Application Building is the "pilot scale" set up for the OEM finishing line. They also use this area for new product development and application of products. HW accumulates in 5 gallon pails at the point of generation and then is transferred to 55 gallon drums. The waste streams generated are waste paint from quality checks; HW contaminated items (trash) characterized as D008; waste mixed solvent from equipment cleaning/purging "KCL", acetone, xylene mix; solvent contaminated water, 5% amine and 95% water; and water borne paint which is on the increase. HW rags are contaminated with naphthalene or alcohol. Currently, most HW is shipped offsite to the PPG Circleville incinerator and last year an off-site shipment of waste was made to Clean Harbors. They are researching off-site disposal to Univar. Some of the Pollution Prevention (P2) activities onsite are as follows: equipment upgrades such as the use of robotics onsite used for paint application has reduced the quantity of waste generated from about 5 gallons to 3/4 of a gallon during each application; share paint among PPG facilities more frequently now; there has been a shift to the use of more water based and powder coat primers; they now use smaller sample size and have reduced the surface area of their paint application processes. Ohio EPA proposed that the waste generated from the gun cleaner process in the Pilot Production Area may be a good candidate for use of a non-hazardous solvent since the waste generated from this unit is dumped into a drum about once a week. During the facility walk through the following was noted: in the Service Building was the Lab with 2, five gallon satellite accumulation containers which were labeled appropriately; the Spray Area had 3, five gallon satellite containers that were labeled appropriately, also red, contaminated rag containers were noted in each area; next was the Pilot Production area where the gun cleaner was noted; when spent, the waste goes into a 55 gallon, HW drum, John is the operator at this location; next was the first of three <90 day HW accumulation areas where three, 55 gallon drums were noted labeled with closed funnels, the date of accumulation for each drum was 4/22/08, each of the three drums was marked "water base paint", "spent solvent", and "solvent base paint"; next was Receiving where there was no HW; next was the outside HW <90 day accumulation area also referred to as the "Pit Area" where 14 HW drums plus an over pack were noted, all marked, labeled, closed and in good condition, the area consisted of a concrete pad sloped to a sump (later it was determined that uncontaminated water discharges to the sanitary sewer when released), HW drums were noted as follows: (1) overpack "haz trash, haz waste" 4/4/08; (4) "haz trash" 4/4/08 oldest drum, drum covers; (1) "spent solvent" 4/2/08; (5) solvent base paint; (5) water base paint; a green, metal spill box was noted at the edge of the pad which contained absorbent, tape, mops, pigs, etc., employees carry cell phones and a phone is located inside the door of the adjacent building for emergency purposes, Fred Hicken does the weekly HW inspection of the <90 day areas including emergency equipment, Will Urse does inspections of the other site wide emergency equipment; next was the Application Building where in the Receiving Area is the third, <90 day HW accumulation area where a drum compactor was noted where empty containers and rags are placed and compacted into 55 gallon drums which are managed as HW; also, in the Receiving Area were (5), 55 gallon HW drums, labeled and marked with each waste stream and closed with the oldest date of 4/2/08; next was the Mix Room where there was no HW, where it was noted that fire extinguishers are checked weekly, Graunau is hired as an outside company to do fire equipment maintenance, the Lordstown Fire Department responds through ADT. The facility tour concluded at this point. The following LDR forms were reviewed for the following waste streams sent to PPG Circleville for disposal: solvent based paint; spent solvent; water based paint; and solvent contaminated water.

**GENERAL REQUIREMENTS**

- |  |   |                             |                              |
|--|---|-----------------------------|------------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40©]  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
4. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Oh. EPA received the 2007 Annual Report on January 11, 2008. Yes  No  N/A
5. Are annual reports kept on file for at least 3 years? [3745-52-40(B)] Yes  No  N/A
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes  No  N/A
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes  No  N/A
8. Does the generator accumulate hazardous waste? Yes  No  N/A

*NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.*

9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes  No  N/A

*NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).*

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
- a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes  No  N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

11. Does the generator export hazardous waste? If so: Yes  No  N/A
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes  No  N/A
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes  No  N/A
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes  No  N/A
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes  No  N/A
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes  No  N/A

**MANIFEST REQUIREMENTS During the inspection Ohio EPA received a copy of the following HW manifest, 000207927 FLE dated April 3, 2008, to PPG Industries in Circleville.**

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes  No  N/A
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes  No  N/A

*NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]*

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes  No  N/A

*NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].*

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes  No  N/A

16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes  No  N/A

*NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.*

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes  No  N/A

18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes  No  N/A

19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes  No  N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

**PERSONNEL TRAINING** PPG appears to have a comprehensive training program and as a follow-up to the inspection provided Ohio EPA, by e-mail, training records for Darla S. Babb, Rick Palumbo and Fred Hicken. Included in the records submittal was information on RCRA/ISO Module on the RCRA refresher training of the facility's Contingency Plan and Emergency Response Plan (including power point overheads) for the RCRA refresher training conducted on 6/27/07. Ohio EPA understands that RCRA training is planned for the "down time" in July of this year.

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes  No  N/A
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes  No  N/A
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes  No  N/A
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes  No  N/A
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes  No  N/A
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes  No  N/A
  - b. Job descriptions [3745-65-16D(2)]? Yes  No  N/A
  - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes  No  N/A
  - d. Completed training or job experience required [3745-65-16D(4)]? Yes  No  N/A
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes  No  N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

**CONTINGENCY PLAN** Sherry Slone reviewed the facility's Contingency Plan during the inspection.

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes  No  N/A
28. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes  No  N/A
  - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes  No  N/A
  - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes  No  N/A
  - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes  No  N/A
  - e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes  No  N/A

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes  No  N/A
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] **During the inspection Ohio EPA noted that Plot Plan for the Lordstown Integrated Contingency Plan needed to be updated regarding location of spill box and the need to show all of the <90 day HW accumulation areas. Later, on April 24, 2008, Ohio EPA received an e-mail message with a "new" Plot Pan attached from Mr. Richard E. Kazmier stating that the new Plot Plan has been incorporated into the Lordstown Integrated Contingency Plan and that item # 11., Protective & Emergency Equipment, had been revised.** Yes  No  N/A

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes  No  N/A   
 NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

#### EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes  No  N/A
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes  No  N/A
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes  No  N/A
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes  No  N/A

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

#### PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal communications or alarm system? [3745-65-32(A)] Yes  No  N/A
- b. Emergency communication device? [3745-65-32(B)] Yes  No  N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes  No  N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes  No  N/A

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes  No  N/A
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] **Ohio EPA received a copy of PPG's "Weekly Spill Box Check List" conducted and completed by Fred Hicken on April 21, 2008.** Yes  No  N/A
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes  No  N/A
38. If there is only one employee on the premises, is there immediate access to a device (ex. phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes  No  N/A
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes  No  N/A
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes  No  N/A

**SATELLITE ACCUMULATION AREA REQUIREMENTS PPG has numerous satellite accumulation areas through out the facility. See General Remarks above.**

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)](1)) Yes  No  N/A

- b. Are under the control of the operator of the process generating the waste? [3745-52-34©)(1)] Yes  No  N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34©)(1)] Yes  No  N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34©)(1)] Yes  No  N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes  No  N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes  No  N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes  No  N/A
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34©)(2)] Yes  No  N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34©)(2)] Yes  No  N/A

*NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.*

**USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**  
**Accumulation areas at this facility.**

**PPG has three <90 day HW**

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes  No  N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes  No  N/A
- b. In good condition? [3745-66-71] Yes  No  N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes  No  N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes  No  N/A

*NOTE: Record location on process summary sheets, photograph the area, and record on facility map.*

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes  No  N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes  No  N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes  No  N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77©)] Yes  No  N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes  No  N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes  No  N/A

*NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.*

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes  No  N/A

*NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

**PRE-TRANSPORT REQUIREMENTS**

These requirements were not evaluated during this inspection.

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes  No  N/A
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A

# LDR CHECKLIST

For PPG Industries Inc. Lordstown  
April 24, 2008 Inspection  
By Kris Coder and Sherry Slone, DHWM

## GENERAL LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A  RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A  RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A  RMK#
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No  N/A  RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A  RMK#
- NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.**
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes  No  N/A  RMK#
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes  No  N/A  RMK#

**NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]**

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes  No  N/A  RMK# \_\_\_\_\_

**NOTE: Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.**

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A  RMK# \_\_\_\_\_

**NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]**

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes \_\_\_\_\_ No \_\_\_\_\_ N/A  RMK# \_\_\_\_\_

**NOTE: In other words, is combustion a legitimate treatment method.**

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes \_\_\_\_\_ No  N/A  RMK# \_\_\_\_\_

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes \_\_\_\_\_ No  N/A  RMK# \_\_\_\_\_

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05] Yes \_\_\_\_\_ No  N/A  RMK# \_\_\_\_\_

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so:

Yes\_\_ No\_\_  N/A\_\_  RMK#

\_\_\_\_\_

a. The facility can land dispose of the waste. [3745-270-06]

Yes\_\_ No\_\_  N/A\_\_  RMK# \_\_\_\_\_

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment?  
If so:

Yes\_\_ No\_\_ N/A\_\_  RMK# \_\_\_\_\_

a. Has the facility complied with 3745-270-04?

Yes\_\_ No\_\_  N/A\_\_  RMK# \_\_\_\_\_

**REMARKS**

**NOTIFICATION AND CERTIFICATION REQUIREMENTS**

- 13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes  No  N/A  RMK#
- 14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes  No  N/A  RMK#
- 15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes  No  N/A  RMK#
- 16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes  No  N/A  RMK#
- 17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so:
  - a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes  No  N/A  RMK#

**NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.(See 270-07(A)(7))**

- 18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes  No  N/A  RMK#

**REMARKS**

THE REST OF THE CR. LIST (P. 5 THRU 10) ARE NOT APPLICABLE TO PPG INDUSTRIES INC. LORDSTOWN.