



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 23, 2012

Ms. Donna Howland
PPG Industries - ERU
559 Pittsburgh Road
Circleville, OH 43113

Re: NOTICE OF VIOLATION - Compliance Test Failed
Facility ID: 0165010146
PPG Industries - ERU
Location: 559 Pittsburgh Road
Circleville, OH 43113
Pickaway County

Dear Ms. Howland:

On March 6-7, 2012, and May 2-3, 2012, The Air Compliance Group, LLC performed a dioxin and furans (D/F) emission Confirmatory Performance Test at the facility indicated above on the Energy Recover Unit (ERU), N001. Ohio EPA received the test report on August 3, 2012. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Methods 1 – 4, and SW-846 Method 0023A. The results of the test showed the source to be out of compliance with the applicable Ohio EPA regulations and your Title V permit terms and conditions for emissions of dioxin and furans.

Our test review shows the following:

- I. **Tested Emission Rate:** (All run values in ng TEQ/dscm at 7%O₂)
- | | |
|----------------|----------------|
| Run #1 – 0.474 | Run #4 – 1.05 |
| Run #2 – 0.516 | Run #5 – 1.21 |
| Run #3 – 0.593 | Run #6 – 0.723 |
| Average – 0.53 | Average – 0.99 |
- II. **Allowable Emission Rate:** 0.20 ng TEQ/dscm at 7% O₂
- III. **Source Operating Rate:** Average Total Hazardous Feed Rate (runs 1,2,3)
7895 lb/hr
Average Total Hazardous Feed Rate (runs 4,5,6)
7707 lb/hr
- IV. **Isokinetic Rate:** Run #1 – 97.9%; Run #2 -97.6%; Run #3 -96.3%
Run #4 – 93.5%; Run #5 -97.3%; Run #6 -97.0%

V. Plan and Schedule

PPG correspondence received via e-mail on August 10, 2012 committed to retesting to demonstrate compliance with the 0.20 ng TEQ/dscm dioxin/furan standard during the week of August 27, 2012.

VI. Requested Action

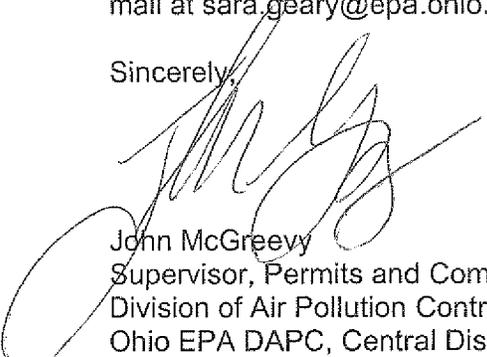
CDO requests that PPG perform US EPA Method 5 during the upcoming test event, in addition to 0023A. In reviewing the emissions test report and associated laboratory analyses, a significant portion of measured dioxin/furan compound mass was collected in the front half of the sampling train. In addition, images of filters provided in the test report appear to be heavily impacted, which may indicate either an issue with emissions control equipment, or the entrainment of activated carbon (“slip”) from the carbon bed system.

Further, CDO requests PPG provide a copy the “detailed study” performed by Battelle and referenced in the August 10, 2012 correspondence.

Acceptance by the Ohio EPA of a compliance plan and schedule does not constitute a waiver of the Ohio EPA’s authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you have any questions, please contact Sara Geary by telephone at 614-995-0668 or by e-mail at sara.geary@epa.ohio.gov.

Sincerely,



John McGreevy
Supervisor, Permits and Compliance
Division of Air Pollution Control
Ohio EPA DAPC, Central District Office

c: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
Charles Hall, Region 5 U.S. EPA
Adam Ward, Assistant Chief
Central District Office, Ohio EPA

ec: John McGreevy, Central District Office, Ohio EPA
Sara Geary, Central District Office, Ohio EPA