

ATTACHMENT

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PPG Industries

Maura LaGreca, Manager EHS
PPG Industries
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November 9, 2006

Waste Management Branch DW-8J
Waste, Pesticides and Toxic Division
United States Environmental Protection Agency
USEPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
Attention Mr. Wen Huang, PE

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7003 1680 0000 5471 0842

Ohio EPA
Division of Waste Management
Attention Regulatory and Information Services
Box 1049
Columbus, Ohio 43216-1049

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7003 1680 0000 5471 0859

Subject: PPG Industries Ohio, Inc.
Draft Ohio RCRA Permit Number 01-65-0641
Draft USEPA RCRA Identification Number OHD004304689

PPG Industries Ohio, Inc. (PPG) owns and operates the Energy Recovery Unit (ERU) pursuant to Ohio RCRA Permit Number 01-65-0641. PPG applied to renew its RCRA permit and has received and reviewed the draft federal and state RCRA permits mailed on September 26, 2006. PPG respectfully submits the following comments to specific terms and conditions in the draft permits:

Draft USEPA RCRA Identification Number OHD004304689

- a. Page 11 section III should be revised to eliminate the requirement for annual submission of election of compliance. The requirement to notify the agency of the compliance election was eliminated from the rules in April 2006.
- b. Page 20 item IV.C.1.a identifies the applicable tanks that comply with level 2 tank requirements defined in 264.1084. The tank capacities identified in the table are the operating capacities, and not the maximum capacity of the tanks identified in the Part A permit renewal application. The table should be updated with those capacities identified for each tank in the Part A permit application to avoid confusion. Also, the two overflow tanks indicated in the table are not regulated tanks, and should be removed as applicable sources.
- c. Page 20 item IV.C.2.c should be removed as process and instrumentation diagrams are not required per 264.1084. In addition, exempt tanks would not be regulated under the rule.
- d. Page 20 of 23 item IV.C.2.b should remove the requirement to monitor the temperature and pressure of each tank. This is not required by rule.
- e. Page 22 item IV.C.3.b (2) should remove specifications of the thermal oxidizer. This information is not required by rule.
- f. Page 23 item IV.C.4 should remove the requirement for hazardous waste tank blanketing with nitrogen. This is not required by rule.

- g. Page 31 item D. second to last paragraph states that a flow meter is provided at the discharge end of the aqueous waste line, and this is monitored in the ERU control room. This information should be corrected to indicate the transfer of aqueous waste is monitored by the ERU tank weight in the ERU control room.
- h. Page 31 item D. last paragraph states that the resin plant waste tanks are equipped with nitrogen to control pressure. This should be eliminated or corrected as nitrogen is provided to reduce ignition potential for flammable liquids as well as minimize air emissions.
- i. Page 44 references NFPA codes. The most recent version of NFPA 30 is 2003. This should be updated from the current 2000 citation, along with the proper designation to the tables in the current version as tables 4.3.2.1.1(a), (b), 4.3.2.1.2, 4.3.2.1.3 and 4.3.2.1.4.
- j. Page 57 item I fifth paragraph PPG requests the elimination of dates and a more general statement indicating the facility's compliance with MACT requirements demonstrated by way of performance testing. This would aid in maintaining the document in current reference over the ten year period of the permit.
- k. Page 58 item I.1.a PPG requests clarifying language to the statement so as to not imply a restriction allowing only hazardous waste for incineration. Such a restriction would eliminate the ability to incinerate nonhazardous wastes or utilize alternative fuels.

Thank you, and please call if you have any questions.

Maura C. LaGreca

Maura C. LaGreca
Manager EHS

cc: F. Ortiz - PPG ERU
D. Mazzocco - PPG AP
C. Terai - PPG GO
Pamela Allen - OEPA DHWM
Chris Bulinski - OEPA CDO