



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 30 2010

REPLY TO THE ATTENTION OF:

AE-17J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tom Tersine, Manager, EHS
PPG Industries, Inc.
10800 South 13th Street
Oak Creek, Wisconsin 53154

Re: Finding of Violation
PPG Industries, Inc.
Oak Creek, Wisconsin

Dear Mr. Tersine:

This is to advise you that the U.S. Environmental Protection Agency finds that PPG Industries, Inc.'s (PPG) facility in Oak Creek, Wisconsin is in violation of the Clean Air Act (CAA) and associated pollution control requirements. A list of the requirements violated is provided below. We are today issuing a Finding of Violation (FOV) to you for these violations.

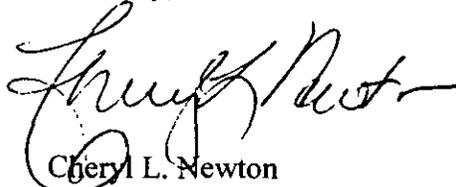
The CAA requires EPA to develop National Emission Standards for Hazardous Air Pollutants (NESHAP) to protect the public health and welfare. To attain and maintain these standards, EPA promulgated Maximum Achievable Control Technology (MACT) standards to address Hazardous Air Pollutant (HAP) emissions from various source categories. PPG is in violation of the MACT standards that regulate HAP emissions from Miscellaneous Organic Chemicals Manufacturing, 40 C.F.R. Part 63, Subpart FFFF (Subpart FFFF), the MACT standards that regulate HAP emissions from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (Subpart G), and the MACT standards that regulate HAP emissions from Equipment Leaks (Subpart UU).

Section 113 of the CAA gives us several enforcement options to resolve these violations. The options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil action.

We are offering you the opportunity to request a conference with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent you at this conference.

The EPA contact in this matter is Constantinos Loukeris. You may call him at (312) 353-6198 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton". The signature is fluid and cursive, with a large initial "C" and "N".

Cheryl L. Newton
Director
Air and Radiation Division

Enclosure

cc: Daniel Schramm, WDNR

**United States Environmental Protection Agency
Region 5**

In the Matter of:)	
)	
PPG Industries, Inc.)	Finding of Violation
Oak Creek, Wisconsin)	
)	EPA-5-10-WI-12
)	
Proceedings Pursuant to)	
the Clean Air Act,)	
42 U.S.C. §§ 7401 et seq.)	

Finding of Violation

PPG Industries, Inc. (PPG) owns and operates a resin manufacturing plant at 10800 South 13th Street, Oak Creek, Wisconsin. This facility is a major source of Hazardous Air Pollutants (HAP).

The U.S. Environmental Protection Agency is issuing this Finding of Violation (FOV) to you to address the alleged violations identified below. The underlying statutory and regulatory requirements include provisions of the Clean Air Act (CAA) and its implementing regulations.

Explanation of Violations

NESHAP for Miscellaneous Organic Chemicals Manufacturing (Subpart FFFF)

1. On November 10, 2003, EPA promulgated the National Emission Standards for Miscellaneous Organic Chemicals Manufacturing at 40 C.F.R. Part 63, Subpart FFFF (68 Fed. Reg. 63888).
2. Subpart FFFF, at 40 C.F.R. § 63.2470(a), requires that you must meet each emission limit in Table 4 to this subpart that applies to your storage tanks, and you must meet each applicable requirement specified in paragraphs (b) through (e) of this section.
3. Table 4 of Subpart FFFF requires that for each Group 1 storage tank you must reduce total HAP emissions by ≥ 95 percent by weight or to ≤ 20 ppmv of TOC or organic HAP and ≤ 20 ppmv of hydrogen halide and halogen HAP by venting emissions through a closed vent system to any combination of control devices (excluding a flare).

4. Subpart FFFF, at 40 C.F.R. § 63.2485(a), states that “you must meet each requirement in table 7 to this subpart that applies to your wastewater streams and liquid streams in open systems within a miscellaneous organic chemical manufacturing process unit (MCPU), except as specified in paragraphs (b) through (o) of this section.”
5. Subpart FFFF, at 40 C.F.R. § 63.2485(b), states that “[w]here § 63.105 and §§ 63.132 through 63.148 refer to compounds in table 9 of subpart G of this part 63, the compounds in tables 8 and 9 to this subpart apply for the purposes of this subpart.”
6. Table 7 of Subpart FFFF requires each process wastewater stream to comply with the requirements in §§ 63.132 through 63.148 and the requirements referenced therein, except as specified in § 63.2485.
7. Subpart FFFF, at 40 C.F.R. § 63.2460(c)(2)(ii), requires that when you conduct a performance test or design evaluation for a non-flare control device used to control emissions from batch process vents, you must establish emission profiles and conduct the test under worst-case conditions according to § 63.1257(b)(8) instead of under normal operating conditions as specified in § 63.7(e)(1).
8. Subpart FFFF, at 40 C.F.R. § 63.2480(a), requires that you must meet each requirement in Table 6 to this subpart that applies to your equipment leaks, except as specified in paragraphs (b) through (d) of this section.
9. Table 6 of Subpart FFFF requires that all equipment in organic HAP service must comply with the requirements of either 40 C.F.R. part 63, subpart UU or subpart H, and the requirements referenced therein, except as specified in § 63.2480(b) and (d), or 40 C.F.R. part 65, subpart F, and the requirements referenced therein, except as specified in § 63.2480(c) and (d).
10. Subpart FFFF, at 40 C.F.R. § 63.2460(a), requires that you must meet each emission limit in Table 2 to this subpart that applies to your batch process vents, and you must meet each applicable requirement specified in paragraphs (b) and (c) of this section.
11. Table 2 of Subpart FFFF requires for each process with a Group 1 process vent that you must reduce collective uncontrolled organic HAP emissions from the sum of all batch process vents within the process by ≥ 98 percent by weight by venting emissions from a sufficient number of the vents through one or more closed-vent systems to any combination of control devices (except a flare).
12. Subpart FFFF, at 40 C.F.R. § 63.2475(a), requires that you must comply with each emission limit and work practice standard in table 5 to this subpart that applies to your

transfer racks, and you must meet each applicable requirement in paragraphs (b) and (c) of this section.

13. Table 5 of Subpart FFFF requires for each Group 1 transfer rack that you must reduce emissions of total organic HAP by ≥ 98 percent by weight or to an outlet concentration ≤ 20 ppmv as organic HAP or TOC by venting emissions through a closed-vent system to any combination of control devices (except a flare).
14. Subpart FFFF, at 40 C.F.R. § 63.2550(i), defines "Group 1 transfer rack" as a transfer rack that loads more than 0.65 million liters/year of liquids that contain organic HAP with a rack-weighted average partial pressure, as defined in § 63.111, greater than or equal to 1.5 pound per square inch absolute.

NESHAP for the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (Subpart G)

15. On April 22, 1994, EPA promulgated the NESHAP for the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater at 40 C.F.R. Part 63, Subpart G (59 Fed. Reg. 19468).
16. Subpart G, at 40 C.F.R. § 63.132(a)(1), requires an owner or operator to determine whether each wastewater stream requires control for Table 9 compounds by complying with the requirements in either paragraph (a)(1)(i) or (a)(1)(ii) of this section, and comply with the requirements in paragraph (a)(1)(iii) of this section.
17. Subpart G, at 40 C.F.R. § 63.132(c), provides instructions for determining whether a wastewater stream is Group 1 or Group 2 for Table 9 compounds. This section states, "Total annual average concentration shall be determined according to the procedures specified in § 63.144(b) of this subpart. Annual average flow rate shall be determined according to the procedures specified in § 63.144(c) of this subpart."
18. Subpart G, at 40 C.F.R. § 63.144(b), requires an owner or operator that elects to comply with paragraph (a)(1) of this section by measuring the concentration for the relevant Table 9 compounds, to determine the annual average concentration for each wastewater stream, either at the point of determination, or downstream of the point of determination with adjustment for concentration changes made according to paragraph (b)(6) of this section. 40 C.F.R. § 63.144(b)(5) requires a minimum of three samples from each wastewater stream, which may be grab samples or composite samples.
19. Subpart G, at 40 C.F.R. § 63.111 defines "Rack-weighted average partial pressure" as the throughput weighted average of the average maximum true vapor pressure of liquids

containing organic HAP transferred at a transfer rack. The rack-weighted average partial pressure shall be calculated using the equation below:

Where:

P = Rack-weighted average partial pressure, kilopascals.

$$P = \frac{\sum P_i G_i}{\sum G_i}$$

P_i = Individual HAP maximum true vapor pressure, kilopascals, = X_i*P, where X_i is the mole fraction of compound i in the liquid.

G_i = Yearly volume of each liquid that contains organic HAP that is transferred at the rack, liters.

i = Each liquid that contains HAP that is transferred at the rack.

20. Subpart G, at 40 C.F.R. § 63.111 defines “Maximum true vapor pressure” as “the equilibrium partial pressure exerted by the total organic HAP’s in the stored or transferred liquid at the temperature equal to the highest calendar-month average of the liquid storage or transfer temperature for liquids stored or transferred above or below the ambient temperature or at the local maximum monthly average temperature as reported by the National Weather Service for liquids stored or transferred at the ambient temperature, as determined:

(1) In accordance with methods described in American Petroleum Institute Publication 2517, Evaporative Loss From External Floating-Roof Tanks (incorporated by reference as specified in § 63.14 of subpart A of this part); or

(2) As obtained from standard reference texts; or

(3) As determined by the American Society for Testing and Materials Method D2879-83 or 96 (incorporated by reference as specified in § 63.14 of subpart A of this part); or

(4) Any other method approved by the Administrator.”

NESHAP for Equipment Leaks (Subpart UU)

21. On June 29, 1999, EPA promulgated the NESHAP for Equipment Leaks – Control Level 2 Standards at 40 C.F.R. Part 63, Subpart UU (64 Fed. Reg. 34899).

22. As stated in paragraph 9, among the requirements of 40 C.F.R. Part 63, Subpart FFFF is 40 C.F.R. § 63.2480(a) and Table 6, which require that organic manufacturing facilities comply with the NESHAP for Equipment Leaks at Subpart UU or Subpart H of 40 C.F.R.

Part 63 or 40 C.F.R. Part 65, Subpart F. PPG elected the NESHAP for Equipment Leaks 40 C.F.R. Part 63, Subpart UU.

23. Subpart UU, at 40 C.F.R. § 63.1022(a), states that “equipment subject to this subpart shall be identified. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility boundaries by some form of weatherproof identification.”
24. Subpart UU, at 40 C.F.R. § 63.1033(b)(1), requires that each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in §§ 63.1021(b), 63.1036, 63.1037, and paragraphs (c) and (d) of this section. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance. The operational provisions of paragraphs (b)(2) and (b)(3) of this section also apply.
25. Subpart UU, at 40 C.F.R. § 63.1033(b)(3), requires that when a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (b)(1) of this section at all other times.
26. Subpart UU, at 40 C.F.R. § 63.1025(b)(1), requires that valves shall be monitored to detect leaks by the method specified in § 63.1023(b) and, as applicable, § 63.1023(c).
27. Subpart UU, at 40 C.F.R. § 63.1023(b)(1), requires that instrument monitoring shall comply with Method 21 of 40 C.F.R. Part 60, Appendix A.
28. Section 8.3.1 of Method 21 of 40 C.F.R. Part 60, Appendix A states that you must “[p]lace the probe inlet at the surface of the component interface where leakage could occur. Move the probe along the interface periphery while observing the instrument readout. If an increased meter reading is observed, slowly sample the interface where leakage is indicated until the maximum meter reading is obtained. Leave the probe inlet at this maximum reading location for approximately two times the instrument response time.”
29. Subpart UU, at 40 C.F.R. § 63.1032(c), requires that each closed-purge, closed-loop, or closed vent system as required in paragraph (b) of this section shall meet the applicable requirements specified in paragraphs (c)(1) through (c)(5) of this section.
30. Subpart UU, at 40 C.F.R. § 63.1032(c)(5), requires containers that are part of a closed purge system must be covered or closed when not being filled or emptied.

NESHAP (Subpart GGG)

31. As stated in paragraph 7, Subpart FFFF at 40 C.F.R. § 63.2460(c)(2)(ii) requires that when you conduct a performance test or design evaluation for a non-flare control device used to control emissions from batch process vents, you must establish emission profiles and conduct the test under worst-case conditions according to 40 C.F.R. § 63.1257(b)(8) instead of under normal operation conditions as specified in § 63.7(e)(1). Subpart GGG at 40 C.F.R. § 63.1257(b)(8), requires testing of emissions on equipment where the flow of gaseous emissions is intermittent (batch operations) shall be conducted as specified in paragraphs (b)(8)(i) through (iii) of this section, which requires testing at “absolute worst-case conditions or hypothetical worst-case conditions.”

General Allegations

32. PPG owns and operates a resin manufacturing plant at 10800 South 13th Street, Oak Creek, Wisconsin (Plant), which is a major source of HAP, as defined in 40 C.F.R. § 63.2 of Subpart A.
33. PPG owns or operates miscellaneous organic chemical manufacturing units (MCPU) as defined at 40 C.F.R. § 63.2435(b), in the resin manufacturing process at the Plant, which are subject to the requirements of 40 C.F.R. Part 63, Subpart FFFF and by reference Subpart UU and Subpart GGG. The process vents, storage vessels, transfer operations, and wastewater at the Plant are also subject to the requirements at 40 C.F.R. Part 63, Subpart G.
34. From June 1, 2009 through June 5, 2009, EPA conducted a Clean Air Act investigation of PPG hereafter referred to as “2009 inspection.”
35. In response to questions raised by EPA during the investigation the week of June 1, 2009 through June 5, 2009, PPG submitted a written response dated June 25, 2009.

Alleged Violations

36. Based on information provided to EPA during the 2009 inspection, EPA found that the WTC 1903 wastewater streams receives wastewater from all of the reactor systems and has several points of determination. PPG elected to determine whether the WTC 1903 wastewater stream was Group 1 or Group 2 for Table 9 compounds by measuring downstream of several points of determination; however PPG failed to adjust for concentration changes as required by 40 C.F.R. § 63.144(6). This is a violation of 40 C.F.R. §§ 63.2485(a), 63.132(c), and 63.144(b)(5).
37. Based on information provided to EPA during the 2009 inspection, EPA determined that PPG did not evaluate WTC 1901 and WTC 1902 as wastewater streams. PPG failed to

determine whether the wastewater streams at WTC 1901 and WTC 1902 are Group 1 or Group 2 for Table 9 compounds in violation of 40 C.F.R. §§ 63.2485(a) and 63.132(a).

38. During the 2009 inspection, EPA discovered a container that is used by PPG to collect residual liquids drained from block and bleed systems at the South Meter Station. PPG failed to identify the container as a point of determination and to determine whether the wastewater therein is Group 1 or Group 2 for Table 9 compounds in violation of 40 C.F.R. §§ 63.2485(a), 63.132(a) and by reference 63.144(b).
39. During the 2009 inspection, EPA performed monitoring for HAP leaks using Method 21 of 40 C.F.R. Part 60, Appendix A and found a significantly higher leak rate on valves located in the Resin plant than that reported by PPG on previous and current monitoring equipment subject to the MON. EPA found a leak rate of 0.4 percent whereas PPG's historical monitoring indicates the previous quarterly monitoring (i.e. January 2009 through March 2009) events to have a 0 percent (%) leak rate with an average quarterly leak rate of 0.04% for the period of May 2008 through June 2010. PPG has conducted deficient Method 21 leak monitoring of valves subject to Subpart UU at the facility in violation of 40 C.F.R. § 63.1025(b)(1) and Method 21 of 40 C.F.R. Part 60, Appendix A.
40. Based on the information provided to EPA during the 2009 inspection, EPA found that PPG does not monitor for HAP leaks at the component interface where leakage may occur for insulated valves located in the Resin plant. PPG failed to perform Method 21 of 40 C.F.R. Part 60, Appendix A on all valves that are insulated in violation of 40 C.F.R. §§ 63.2480(a), 63.1025(b)(1), and Section 8.3.1 of Method 21 of 40 C.F.R. Part 60, Appendix A.
41. Based on the information provided to EPA during the 2009 inspection, EPA found that PPG did not verify that equipment was in organic HAP service prior to monitoring for leaks. PPG failed to determine HAP leaks in conformance with Method 21 of 40 C.F.R. Part 60, Appendix A during periods when equipment was in organic HAP service in violation of 40 C.F.R. § 63.2480(a) and Table 6 of Subpart FFFF.
42. During the 2009 inspection, EPA found that a significant number of equipment tags were missing on process equipment, including but not limited to the R1 thin tank and R6 reactor located at the Resin plant, which were in HAP service. Although 40 C.F.R. § 63.1022(a) does not require physical tagging, PPG uses physical tags in conjunction with log sheets to identify equipment in service. PPG failed to identify all equipment subject to Subpart UU and to perform Method 21 of 40 C.F.R. Part 60, Appendix A on such equipment in violation of C.F.R. §§ 63.2480(a), 63.1022(a), and Method 21 of 40 C.F.R. Part 60, Appendix A.
43. During the 2009 inspection, EPA found an uncovered container that is part of a closed purge system to a sampling connection to Reactor 7. Under 40 C.F.R. § 63.1032(c)(5),

containers that are part of a closed purge system are required to be covered or closed when not being filled or emptied. PPG failed to cover a container used in a closed purge system during periods when not being filled or emptied in violation of 40 C.F.R. §§ 63.2480(a), 63.1032(c), and 63.1032(c)(5).

44. During the 2009 inspection, EPA found that the open-ended lines listed below were not equipped with a cap, blind flange, plug, or a second valve. At the time of the inspection, operations did not require process fluid flow through these open-ended lines, and PPG was not conducting maintenance on the lines. PPG failed to properly equip the open-ended lines listed below in violation of 40 C.F.R. §§ 63.2480(a) and 63.1033(b)(1):

- a. 15418 Valve
- b. 1823 (R4 Reactor Condenser/Decanter)
- c. 2338 Valve
- d. 338 Valve (To R6 Decanter)
- e. R4 Reflux Sample Line
- f. R4 Misc. Tank
- g. 2853.14
- h. Valve below 3173 (evidence of a visual dripping)
- i. R6 Thin Tank Filter Line Connect to Nitrogen
- j. Two (2) open-ends near tag# 9340
- k. 9350 Valve
- l. 9357 Valve
- m. R2 Thin Tank Filter Line for sampling/draining the filter
- n. R7 Reactor Reflux Line
- o. 9010 (pressure gauge valve)
- p. Solvent Recovery Area, Organic Waste Line near SZB-803
- q. OEL between AST 125 and AST 127
- r. R6 Thin Tank Drain Line
- s. R3 Thin Tank
- t. Two (2) open ends at R4 Thin Tank off the filling area
- u. R3 Poly Tank near tag# 3392 (evidence of a visual dripping)

Note: The identification of each open-ended line may have a reference to a component nearby, if there wasn't a tag on a valve associated with the open-ended line.

45. During the EPA inspection in 2009, EPA identified 29 block and bleed open-ended systems (9 in the North Meter Station and 20 in the South Meter Station) that were not in use and did not have a cap, blind flange, plug or second valve in violation of 40 C.F.R. §§ 63.2480(a), 63.1033(b)(3) and 63.1033(b)(1).

46. a. During the 2009 inspection, EPA monitored closure devices (i.e. caps, blind flanges, plugs, or second valves) of 6 open-ended lines (listed below) using Method 21 as

specified in 40 C.F.R. Part 60, Appendix A and detected emissions at concentrations greater than 500 parts per million (ppm) as follows:

- i. 2334 V Cam Lock – 2,600 ppm,
- ii. To R6 Cam Lock – 2,200 ppm,
- iii. 2762.26 Cam Lock – 1,200 ppm,
- iv. To R2 Decanter (South Meter Station) – 666 ppm,
- v. To R3 Thin Tank (South Meter Station) – 561 ppm, and
- vi. To R2 Acid/Oil (South Meter Station) – 840 ppm (evidence of visual dripping).

b. PPG's closure devices failed to seal the open-ended lines identified in this paragraph at all times in violation of 40 C.F.R. §§ 63.2480(a) and 63.1033(b)(1).

47. a. PPG uses a thermal oxidizer unit to reduce HAPs emissions from its storage tanks; however PPG did not operate the thermal oxidizer on the following dates:

- i. According to PPG's February 27, 2009 Semi-Annual Compliance Report, PPG did not operate the thermal oxidizer unit on the following dates: July 4, 2008, July 6, 2008, July 7, 2008, July 8, 2008, November 23, 2008, November 24, 2008, November 25, 2008, November 26, 2008, November 27, 2008, November 28, 2008, November 29, 2008, November 30, 2008, December 21, 2008, December 22, 2008, December 23, 2008, December 24, 2008, December 25, 2008, December 26, 2008, December 27, 2008, December 28, 2008 and December 31, 2008;
- ii. According to PPG's August 28, 2009 Semi-Annual Compliance Report, PPG did not operate thermal oxidizer on the following dates: January 1, 2009, February 9, 2009, February 15, 2009, February 16, 2009, February 21, 2009, February 23, 2009, February 23, 2009, February 24, 2009 and June 29, 2009;
- iii. According to PPG's February 27, 2010 Semi-Annual Compliance Report, PPG did not operate thermal oxidizer unit on the following dates: July 1, 2009, July 2, 2009, July 3, 2009, July 4, 2009, July 5, 2009, July 18, 2009, July 31, 2009, September 7, 2009.

b. PPG failed to comply with the HAP emission limits applicable to PPG's Group 1 storage tanks in violation of 40 C.F.R. §§ 63.2470(a) and Table 4 of Subpart FFFF on the dates that PPG failed to operate the thermal oxidizer.

48. During the 2009 inspection, EPA found relief manways (i.e. PPG's referenced, "emergency relief manways") on Group 1 storage tanks (e.g. AST 151, AST 136, and AST 137) located in the Resin plant bulk storage tank farms to have HAP emissions that

were released to the atmosphere during normal operations. PPG failed to reduce HAP emissions by ≥ 95 percent by weight for each Group 1 storage tank in violation of 40 C.F.R. §§ 63.2470(a) and Table 4 of Subpart FFFF.

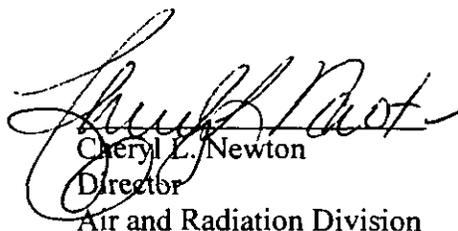
49. Based on information provided to EPA during the 2009 inspection, EPA determined that PPG conducted a performance test on the thermal oxidizer unit, which controls HAP emissions regulated under Subpart FFFF, in October 2008, without establishing an emissions profile to demonstrate testing under worst-case conditions. PPG failed to conduct a valid performance test in violation of 40 C.F.R. §§ 63.2460(c)(2)(ii) and 63.1257(b)(8).
50. Based on information provided to EPA during the 2009 inspection, EPA determined that PPG supplemented the October 2008 performance test with one individual test run conducted in October 2003 that demonstrated a removal efficiency of 99.1 at an average temperature of 1,342°F. The October 2003 testing was conducted without establishing an emissions profile to demonstrate testing under worst-case conditions. PPG failed to conduct a valid performance test in violation of 40 C.F.R. §§ 63.2460(c)(2)(ii) and 63.1257(b)(8).
51. a. PPG uses a thermal oxidizer unit to control emissions from its batch process vents. In its Semi-Annual Compliance Report for 2008 (dated February 27, 2009), PPG reported the following dates where the thermal oxidizer unit combustion temperature was $< 1,400^{\circ}\text{F}$:
 - i. May 10-13, 18-23, 26-29;
 - ii. June 3-4, 8, 11-12, 16, 17, 19-24, 28-30;
 - iii. July 3, 9-11, 15, 23-24, 27-29;
 - iv. August 1-4, 6-7, 10-16, 18-19, 22, 26-31;
 - v. September 1-22, 25-30; and
 - vi. October 1.
- b. In its Semi-Annual Report for 2010 (dated August 13, 2010), PPG reported that the thermal oxidizer unit combustion temperature was $< 1,400^{\circ}\text{F}$ on June 21, 2010;
- c. PPG failed to achieve the combustion temperature in the thermal oxidizer unit necessary for the batch process vents to meet emission limits (reduce HAP emissions by ≥ 98 by weight) for the periods noted in this paragraph in violation of 40 C.F.R. § 63.2460(a) and Table 2 of Subpart FFFF.
52. Based on information provided to EPA during the 2009 inspection, EPA determined that PPG has improperly calculated the rack weighted average partial pressure by using mole fractions based on the total organic liquids (HAP and non HAP) present in a stream. The maximum true vapor pressure is the equilibrium partial pressure exerted by the total

organic HAP's in the stored or transferred liquid. PPG's improper calculations led to an incorrect Group 2 status determination for the transfer racks. EPA determined the rack weighted average partial pressure to be greater than 1.5 pounds per square inch absolute. PPG failed to comply with the Group 1 transfer rack requirements in violation of 40 C.F.R. § 63.2475(a) and Table 5 of Subpart FFFF.

Environmental Impact of Violations

53. These violations have caused or can cause excess emissions of HAPs. Violation of the NESHAP standards can result in excess HAP emissions that may cause serious health effects, such as birth defects and cancer, and harmful environmental and ecological effects.

Date: 9/30/10


Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

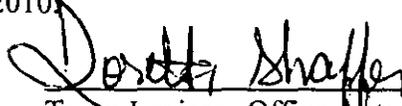
I, Tracy Jamison, certify that I sent a Finding of Violation, No. EPA-5-10-WI-12, by Certified Mail, Return Receipt Requested, to:

Tom Tersine, Manager, EHS
PPG Industries, Inc.
10800 South 13th Street
Oak Creek, Wisconsin 53154

I also certify that I sent copies of the Finding of Violation by first class mail to:

Daniel Schramm
Supervisor, Team 1
Southeast Region
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212

on the 30th day of September, 2010.



Tracy Jamison, Office Automation Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7001 0330 0006 0192 0324