



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

NOV 16 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Theodore Ladd
Plant Manager, Barberton Plant
4829 Fairland Road
Barberton, OH 44203

Re: Administrative Order EPA-5-16-113(a)-OH-16

Dear Mr. Ladd,

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at (312) 886-6797.

Sincerely,

A handwritten signature in black ink that reads "Sarah Marshall".

Sarah Marshall
Chief
Air Enforcement and Compliance Assurance Section (MI/WI)

Enclosure:

cc: Robert L. Brubaker, Porter Wright Morris & Arthur LLP
Robert Hodanbosi, Ohio EPA
Sam Rubens, Akron Regional Air Quality Management District

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-16-113(a)-OH-16
)	
PPG Industries, Inc.)	Proceeding Under Sections 113(a)(1), 113(a)(3)
Barberton, Ohio)	and 114(a)(1) of the Clean Air Act,
)	42 U.S.C. §§ 7413(a)(1), 7413(a)(3), and 7414(a)(1)
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Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to PPG Industries, Inc. (PPG) under Sections 113(a)(1), 113(a)(3), and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(1), 7413(a)(3), and 7414(a)(1).

Statutory and Regulatory Background

Ohio State Implementation Plan

2. Each state must submit to the Administrator of EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410. Upon approval by EPA, the plan becomes part of the applicable State Implementation Plan (SIP) for the state.

3. Pursuant to Section 113(a) and (b) of the CAA, 42 U.S.C. § 7413(a) and (b), upon EPA approval, SIP requirements are federally enforceable under Section 113.

4. On August 4, 2011, EPA approved OAC 3745-21-07(M), with an effective date of September 19, 2011, as part of the federally enforceable Ohio SIP. 76 Fed. Reg. 51901 (August 19, 2011). OAC 3745-21-07(M) provides facility-specific and general control requirements for operations using liquid organic materials.

5. The Ohio SIP at OAC 3745-21-07(M)(1) states, in part, that Emission Unit P098 at the PPG Barberton Plant is subject to the control requirements of paragraph (M)(2) of this rule.

6. The Ohio SIP at OAC 3745-21-07(M)(2) requires that emission units identified in paragraph (M)(1) of the rule, and not exempt under the provisions of paragraph (M)(5) of the rule, be equipped with a control system that reduces organic compound emissions from the emission unit by at least eighty-five per cent, by weight, or, if the reductions are achieved by incineration, oxidizes ninety per cent or more of the carbon in the organic material to carbon dioxide.

7. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Federally Enforceable State Permits to Install

8. On January 22, 2003, EPA approved OAC Rule 3745-31-05 as part of the federally-enforceable Ohio SIP with an effective date of March 10, 2003. 68 Fed. Reg. 2909.

9. OAC Rule 3734-31-05 authorizes the Ohio Environmental Protection Agency (Ohio EPA) to, among other things, issue federally-enforceable Permits-to-Install (PTI) with such terms and conditions as are necessary to ensure compliance with applicable laws.

Title V Permit Program

10. Title V of the CAA, 42 U.S.C. §§ 7661-7661f, established an operating permit program for major sources of federally regulated air pollutants.

11. In accordance with Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), the EPA promulgated regulations establishing the minimum elements of a Title V permit program to be

administered by any air pollution control agency. See 57 Fed. Reg. 32295 (July 21, 1992).

Those regulations are codified at 40 C.F.R. Part 70.

12. Section 502(d) of the CAA, 42 U.S.C. § 7661a(d), provides that each state must submit to the EPA a permit program meeting the requirements of Title V.

13. On August 15, 1995, EPA approved the State of Ohio Title V permit program with an effective date of October 1, 1995. 60 Fed. Reg. 42045.

14. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), 40 C.F.R. § 70.7(b), and OAC Rule 3745-77-02(A) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

15. 40 C.F.R. § 70.6(b) and OAC Rule 3745-77-10 provide that that all terms and conditions in a Title V permit are enforceable by EPA, except for those terms and conditions imposed pursuant to state law and specifically designated as not being federally enforceable.

16. Under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a Title V permit. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Title V Permits and PTI Requirements - Teslin Plant

17. On November 21, 2005, Ohio EPA issued a Title V permit to the Facility for the Teslin Plant (2005 Teslin Permit). On September 27, 2007, Ohio EPA issued Permit-to-Install Number 16-02500 for the construction of Teslin Line 4 (2007 Teslin PTI). On May 2, 2012, Ohio EPA issued a Title V (Permit Number P0106487) to the Facility for the Teslin Plant (Current Teslin Permit). These three permits shall be described collectively as “the Teslin Permits.”

18. The Current Teslin Permit for P110 (Teslin Line 2) at C.1.f), and for P114 and P115 (Teslin Lines 3 and 4) at C.2.f) contains testing requirements which require PPG to track and record the use of trichloroethylene (TCE) and to calculate and record the emissions of TCE and organic compounds (OC) following specific procedures. These testing requirements allow the Teslin plant to demonstrate compliance with applicable emission limitations and control efficiency requirements.

19. The 2007 Teslin PTI at Part III, A.V., contains testing requirements which require PPG to track and record the use of TCE and to calculate and record the emissions of TCE and OC following specific procedures. These testing requirements allow the Teslin plant to demonstrate compliance with applicable emission limitations and control efficiency requirements.

20. The Current Teslin Permit specifies certain control requirements for Teslin Lines 3 and 4 (P114 and P115) at C.2.b)(2)e. That subparagraph requires that the primary process enclosures, defined as the mixer, extractor, dryer, and oven, shall be totally enclosed such that all TCE and OC emissions are captured, contained, and directed to the carbon adsorption unit.

21. The control requirements for Teslin Lines 3 and 4 (P114 and 115) at C.2.b)(2)f. of the Current Teslin Permit specify that, among other things, the primary process enclosures shall meet all of the criteria at C.2.b)(2)f.i. through v. if the capture efficiency of the enclosure and control device is to be assumed to be 100%. The Current Teslin Permit at C.2.b)(2)f.i. provides that any natural draft opening (NDO) shall be at least four equivalent opening diameters from each TCE/OC emitting point. The Current Teslin Permit further states, in that subparagraph, that if the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = \left[\frac{4(\text{area})}{\pi} \right]^{1/2}$$

The Current Teslin Permit further states at C.2.b)(2)g. that the primary process enclosures serving Teslin Lines 3 and 4 shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 C.F.R. Part 51, Appendix M, Reference Method 204. EPA guidance on Method 204 specifies that the ED calculation in the Current Teslin Permit may be used for natural draft openings that are circular/oval or square/rectangular. EPA guidance on Method 204 further indicates that ED may be calculated for square/rectangular type openings using the following alternative calculation:

$$ED = \frac{2LW}{L + W}$$

where L = Length and W = Width.

Title V Permit and PTI Requirements - South Plant

22. On August 17, 2012, Ohio EPA issued Title V Permit Number P0106489 to the Facility for the South Plant (2012 South Plant Title V Permit).

23. The emission limitations for the Chloroformate Plant at C.1.b)(1)a. of the 2012 South Plant Title V Permit specify that organic materials emissions shall not exceed 2.00 lbs/hr.

24. The control requirements for the Chloroformate Plant at C.1.b)(1)b. of the 2012 South Plant Title V Permit require organic compounds to be reduced by 85% overall control efficiency, by weight; however, if incineration is used to reduce emissions, a 90% destruction efficiency is required. The testing requirements for the Chloroformate Plant at C.1.f)(1)e. state that compliance with the emission limitations for Volatile Organic Compounds shall be demonstrated as long as compliance with 40 C.F.R. Part 63, Subpart FFFF, is achieved and maintained.

25. On April 8, 2010, Ohio EPA issued a PTI to the Facility (Permit Number P0106015) for Emission Unit P098 (Chloroformate Plant) with an effective date of April 8, 2010 (2010 PTI).

26. The emission limitations for the Chloroformate Plant at C.1.b)(1)a. of the 2010 PTI specify that organic materials emissions shall not exceed 2.00 pounds per hour (lbs/hr).

27. The control requirements for the Chloroformate Plant at C.1.b)(1)b. of the 2010 PTI require an 85% overall organic compound control efficiency, by weight; however, if incineration is used to reduce emissions, a 90% destruction efficiency is required.

Section 114 of the CAA

28. The Administrator of EPA may require any person who owns or operates an emission source to provide information required by the Administrator under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings of Fact and Alleged Violations

29. PPG owns and operates three plants at its campus located at 4829 Fairland Road, Barberton, Ohio.

30. On October 26, 2012, EPA issued to PPG a CAA Section 114 Information Request (2012 Information Request). PPG provided a response on February 13, 2013. PPG's initial response included most but not all of the monitoring records related to the leak detection and repair (LDAR) requirements in the Current Teslin Permit that EPA requested. PPG subsequently discovered the missing LDAR monitoring records and submitted them to EPA on December 6, 2013.

31. On July 10, 2013, EPA issued to PPG a Notice and Finding of Violation (NOV/FOV) alleging, among other things, that it violated provisions of the Teslin Permits by not tracking, calculating, and recording emissions as required; that the NDO within the Teslin permanent enclosure did not meet the requirements of the 2005 Teslin Permit and the Current Teslin Permit; and that it violated provisions of its South Plant Permit and the Ohio SIP by failing to perform valid performance tests.

32. On November 5, 2013, representatives of PPG and EPA discussed the July 10, 2013 NOV/FOV. Among other things, PPG provided additional information that was responsive to the 2012 Information Request including records related to the LDAR requirements of the Current Teslin Permit.

33. On February 7, 2014, and December 12, 2014, EPA issued CAA Section 114 Information Requests requiring PPG to conduct performance testing at the South Plant and provide additional information. PPG provided responses on March 31, 2014; May 7, 2014; August 1, 2014; and January 21, 2015.

34. On May 27 and 28, 2014, PPG conducted a performance test at the South Plant incinerator and emergency scrubber (May 2014 Performance Test). This test was conducted to satisfy the February 7, 2014 Information Request.

35. The May 2014 Performance Test estimated an average destruction efficiency at the incinerator of greater than 66.14%, a control efficiency at the emergency scrubber of -2,125.4% and an OC emission rate at the emergency scrubber of 3.96 lbs/hr.¹ The outlet concentration from the incinerator was below the detection limit of the test method, and the

¹ A negative control efficiency value indicates that the concentration of organic compounds increased from the inlet to the outlet of the control device.

detection limit of the test method was less than 10% of the inlet concentration, so an adequate test of the 90% destruction efficiency was not feasible.

36. On October 28 and 29, 2014, PPG conducted a second performance test at the South Plant incinerator and emergency scrubber (October 2014 Performance Test). This test was conducted to demonstrate compliance with applicable limits following plant modifications undertaken in response to the results of the May 2014 Performance Test.

37. The October 2014 Performance Test identified an average destruction efficiency at the incinerator of 77.5%, an average destruction efficiency at the emergency scrubber of 33.8%, and an OC emission rate at the emergency scrubber of 0.24 lbs/hr.

38. In a January 26, 2015, letter to the Ohio EPA, PPG submitted a formal request for an amendment to OAC 3745-21-07(M) to exempt Emission Unit P098 at the South Plant from the percent reduction requirements for organic compounds in that rule.

39. On February 5, 2015, EPA issued to PPG a second NOV/FOV alleging that it had violated Section 114 of the CAA by not providing a complete response to the 2012 Information Request, and that it violated provisions of its PTI, Title V Permit, and the Ohio SIP by exceeding OC emissions limitations at the Chloroformate Plant when the emergency scrubber was being used as the primary pollution control device and by failing to meet control efficiency requirements for the incinerator and the emergency scrubber at the Chloroformate Plant.

Compliance Program

40. By no later than 365 days from the effective date of this Order, PPG must achieve, demonstrate, and maintain compliance with the mass emission limits for organic compounds in the 2010 PTI No. P0106015 for P098, with the control and testing requirements for the Chloroformate Plant in the 2012 South Plant Title V Permit, and with the criteria for

permanent total enclosures with square or rectangular natural draft openings set forth at 40 C.F.R. Part 51, Appendix M, Reference Method 204 and EPA's associated guidance for Teslin Lines 3 and 4 (P114 and 115).

41. Within three months of the effective date of this Order, PPG must apply to Ohio EPA to amend the Current Teslin Permit to specifically allow for an alternative method to calculate the compliance of any NDO within the Teslin process enclosure.

42. For each of the two six month periods following the effective date of this Order, PPG must prepare and submit a report containing:

- a. The electronic spreadsheet containing the records maintained and calculations performed pursuant to the testing requirements at C.1(f) of the Current Teslin Permit for Teslin Line 2 (P110), during the six month period of the report;
 - b. The electronic spreadsheet containing the records maintained and calculations performed pursuant to the testing requirements at C.2(f) of the current Title V Permit for Teslin Lines 3 & 4 (P114 & 115), during the six month period of the report;
 - c. All records maintained for the LDAR program for Teslin Lines 3 & 4 (P114 & P115) required by the Current Teslin Permit, during the six month period of the report;
 - d. Any air permit applications sent to, and draft or final air permit issuances received from, the Ohio EPA during the six month period of the report;
- and

e. Documentation of any communication with the Ohio EPA regarding revision of the Ohio SIP requested by PPG as described in paragraph 38, above, during the six month period of the report.

43. The semi-annual reports outlined in paragraph 42, above, must be submitted to EPA within 30 days after the end of the period.

44. PPG must send all reports required by this Order to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

And by email to kane.eleanor@epa.gov and
prentice.dakota@epa.gov.

General Provisions

45. This Order does not affect PPG's responsibility to comply with other federal, state, and local laws.

46. This Order does not restrict EPA's authority to enforce the Ohio SIP or any other section of the CAA.

47. Nothing in this Order limits EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for any violation by PPG of the Ohio SIP or PPG's permits for the Teslin Plant and South Plant.

48. Failure to comply with this Order may subject PPG to penalties of up to \$37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R.

Part 19.

49. The terms of this Order are binding on PPG, its assignees and successors. PPG must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.

50. PPG may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If PPG fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

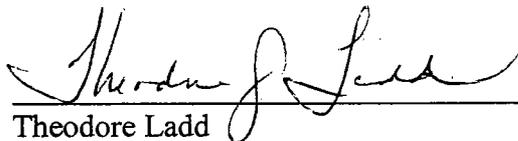
51. This order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, please furnish an electronic copy on physical media such as compact disk, flash drive or other similar item. If it is not possible to submit the information electronically, submit the response to this Order without staples; paper clips and binder clips, however, are acceptable.

52. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action, to the extent permitted by law.

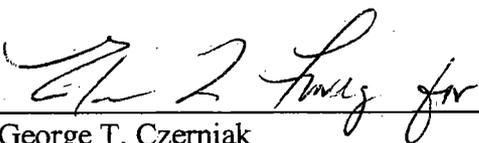
53. PPG agrees to the entry of this Order without admission of fact, violation, or liability.

54. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate eighteen months from the effective date, provided that PPG has complied with all terms of the Order throughout its duration.

10/22/2015
Date


Theodore Ladd
Plant Manager, Barberton Plant
PPG Industries, Inc.

11/13/15
Date


George T. Czerniak
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-16-113(a)-OH-16
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Barberton, Ohio)	and 114(a)(1) of the Clean Air Act,
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Administrative Consent Order

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Statutory and Regulatory Background

Ohio State Implementation Plan

2. Each state must submit to the Administrator of EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410. Upon approval by EPA, the plan becomes part of the applicable State Implementation Plan (SIP) for the state.

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8. On January 22, 2003, EPA approved OAC Rule 3745-31-05 as part of the federally-enforceable Ohio SIP with an effective date of March 10, 2003. 68 Fed. Reg. 2909.

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16. Under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a Title V permit. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Title V Permits and PTI Requirements - Teslin Plant

17. On November 21, 2005, Ohio EPA issued a Title V permit to the Facility for the Teslin Plant (2005 Teslin Permit). On September 27, 2007, Ohio EPA issued Permit-to-Install Number 16-02500 for the construction of Teslin Line 4 (2007 Teslin PTI). On May 2, 2012, Ohio EPA issued a Title V (Permit Number P0106487) to the Facility for the Teslin Plant (Current Teslin Permit). These three permits shall be described collectively as “the Teslin Permits.”

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¹ A negative control efficiency value indicates that the concentration of organic compounds increased from the inlet to the outlet of the control device.

detection limit of the test method was less than 10% of the inlet concentration, so an adequate test of the 90% destruction efficiency was not feasible.

36. On October 28 and 29, 2014, PPG conducted a second performance test at the South Plant incinerator and emergency scrubber (October 2014 Performance Test). This test was conducted to demonstrate compliance with applicable limits following plant modifications undertaken in response to the results of the May 2014 Performance Test.

37. The October 2014 Performance Test identified an average destruction efficiency at the incinerator of 77.5%, an average destruction efficiency at the emergency scrubber of 33.8%, and an OC emission rate at the emergency scrubber of 0.24 lbs/hr.

38. In a January 26, 2015, letter to the Ohio EPA, PPG submitted a formal request for an amendment to OAC 3745-21-07(M) to exempt Emission Unit P098 at the South Plant from the percent reduction requirements for organic compounds in that rule.

39. On February 5, 2015, EPA issued to PPG a second NOV/FOV alleging that it had violated Section 114 of the CAA by not providing a complete response to the 2012 Information Request, and that it violated provisions of its PTI, Title V Permit, and the Ohio SIP by exceeding OC emissions limitations at the Chloroformate Plant when the emergency scrubber was being used as the primary pollution control device and by failing to meet control efficiency requirements for the incinerator and the emergency scrubber at the Chloroformate Plant.

Compliance Program

40. By no later than 365 days from the effective date of this Order, PPG must achieve, demonstrate, and maintain compliance with the mass emission limits for organic compounds in the 2010 PTI No. P0106015 for P098, with the control and testing requirements for the Chloroformate Plant in the 2012 South Plant Title V Permit, and with the criteria for

permanent total enclosures with square or rectangular natural draft openings set forth at 40 C.F.R. Part 51, Appendix M, Reference Method 204 and EPA's associated guidance for Teslin Lines 3 and 4 (P114 and 115).

41. Within three months of the effective date of this Order, PPG must apply to Ohio EPA to amend the Current Teslin Permit to specifically allow for an alternative method to calculate the compliance of any NDO within the Teslin process enclosure.

42. For each of the two six month periods following the effective date of this Order, PPG must prepare and submit a report containing:

- a. The electronic spreadsheet containing the records maintained and calculations performed pursuant to the testing requirements at C.1(f) of the Current Teslin Permit for Teslin Line 2 (P110), during the six month period of the report;
- b. The electronic spreadsheet containing the records maintained and calculations performed pursuant to the testing requirements at C.2(f) of the current Title V Permit for Teslin Lines 3 & 4 (P114 & 115), during the six month period of the report;
- c. All records maintained for the LDAR program for Teslin Lines 3 & 4 (P114 & P115) required by the Current Teslin Permit, during the six month period of the report;
- d. Any air permit applications sent to, and draft or final air permit issuances received from, the Ohio EPA during the six month period of the report;
and

- e. Documentation of any communication with the Ohio EPA regarding revision of the Ohio SIP requested by PPG as described in paragraph 38, above, during the six month period of the report.

43. The semi-annual reports outlined in paragraph 42, above, must be submitted to EPA within 30 days after the end of the period.

44. PPG must send all reports required by this Order to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

And by email to kane.eleanor@epa.gov and
prentice.dakota@epa.gov.

General Provisions

45. This Order does not affect PPG's responsibility to comply with other federal, state, and local laws.

46. This Order does not restrict EPA's authority to enforce the Ohio SIP or any other section of the CAA.

47. Nothing in this Order limits EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for any violation by PPG of the Ohio SIP or PPG's permits for the Teslin Plant and South Plant.

48. Failure to comply with this Order may subject PPG to penalties of up to \$37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

49. The terms of this Order are binding on PPG, its assignees and successors. PPG must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.

50. PPG may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If PPG fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

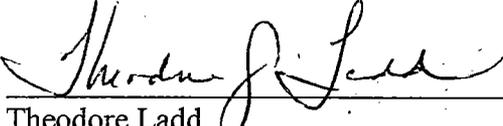
51. This order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, please furnish an electronic copy on physical media such as compact disk, flash drive or other similar item. If it is not possible to submit the information electronically, submit the response to this Order without staples; paper clips and binder clips, however, are acceptable.

52. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action, to the extent permitted by law.

53. PPG agrees to the entry of this Order without admission of fact, violation, or liability.

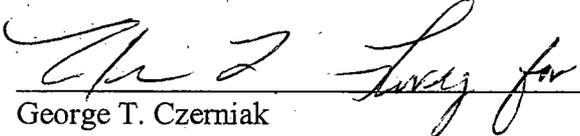
54. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate eighteen months from the effective date, provided that PPG has complied with all terms of the Order throughout its duration.

10/22/2015
Date



Theodore Ladd
Plant Manager, Barberton Plant
PPG Industries, Inc.

11/13/15
Date



George T. Czerniak
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA-5-16-113(a)-OH-16, by certified mail, return receipt requested, to:

Theodore Ladd
Plant Manager, Barberton Plant
4829 Fairland Road
Barberton, OH 44203

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-OH-16, by first-class mail to:

Robert L. Brubaker, Esq.
Porter Wright Morris & Arthur LLP
41 South High Street, Suites 2800-3200
Columbus, OH 43215-6194

Robert Hodanbosi
Chief, Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
Columbus, OH 43215

Sam Rubens, Air Administrator
Akron Regional Air Quality Management District
146 South High St, Room 904
Akron, OH 44308

On the 16 day of November 2015.



Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT
NUMBER:

7014 2870 0001 9581 3035